COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE
4949-A Cox Road, Glen Allen, Virginia 23060
(804) 527-5020 Fax (804) 527-5106
www.deq.virginia.gov

L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

Gerard Seeley, Jr.
Regional Director

AUG 15 2008

David Ryan
IMTT-Virginia West
5500 Old Osborne Turnpike
Richmond, VA 23231

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

RE: VPDES Permit No. VA0055409 Reissuance

Dear Mr. Ryan:

Your VPDES permit is enclosed. This permit supersedes the previous VPDES Permit VA0055409 issued to this facility. A Discharge Monitoring Report (DMR) form is included with the permit. Please make additional copies of the DMR for future use. The first DMR required by this permit for monthly monitored parameters is due on October 10, 2008 for the period September 1, 2008 through September 30, 2008. If you still have DMR data to report as required by the previous permit please submit it as an attachment to the first DMR required by this permit. Monitoring results on the DMRs should be reported to the same number of significant digits as are included in the permit limit for the parameter. Please send DMRs to:

Virginia Department of Environmental Quality
Piedmont Regional Office
4949-A Cox Road
Glen Allen, VA 23060

Note that DEQ has launched an e-DMR program that allows you to submit the effluent data electronically. If you are interested in participating in this program please visit the following website for details:

http://www.deq.virginia.gov/water/edmrfaq.html

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have thirty days from the date of service (the date you actually received this decision or the date it was mailed to you, whichever occurred first) within which to appeal this decision by filing a notice of appeal in accordance with the Rules of the Supreme Court of Virginia with the Director, Department of Environmental Quality. In the event that this decision is served on you by mail, three days are added to that period.

Alternatively, any owner under §§ 62.1 - 44.16, 62.1 - 44.17, and 62.1 - 44.19 of the State Water Control Law aggrieved by any action of the State Water Control Board taken without a

formal hearing, or by inaction of the Board, may demand in writing a formal hearing of such owner's grievance, provided a petition requesting such hearing is filed with the Board. Said petition must meet the requirements set forth in 9 VAC 25-230-130B of Procedural Rule #1. In cases involving actions of the Board, such petition must be filed within thirty days after notice of such action is mailed to such owner by certified mail.

If you have any questions about the permit, please call Jeremy Kazio at (804) 527-5044 or email jskazio@deq.virginia.gov.

Sincerely,

Curtis J. Linderman, P.E.
Water Permits Manager

Enclosure: Permit No. VA0055409
cc: OWPP
EPA, Region III-3WP12

MEMORANDUM

DEPARTMENT OF ENVIRONMENTAL QUALITY

4949-A Cox Road Glen Allen, VA 23060 **804/527-5020**

SUBJECT: Reissuance of VPDES Permit No. VA0055409, IMTT-Virginia West

TO: Curtis J. Linderman, Water Permit Manager

FROM: Jeremy Kazio, Environmental Specialist II

DATE: August 6, 2008

COPIES: OWPS, EPA

Legal Name of Owner: IMTT Holdings, Inc.

Application Submitted By: IMTT-Virginia West
Michael T. Spence, Terminal Manager (no longer employed by IMTT Virginia: New contact for this facility is David Ryan, Project Manager/CSM/FSO)

Application Date: The application was received on January 10, 2008. The application was considered complete on March 20, 2008.

Type of Discharge: Existing Industrial discharge

Wastewater Treatment: Treatment consists of an oil/water separator, activated carbon box, and a sedimentation pond.

Receiving Stream:

Stream:	UT James River
River Basin:	James River (lower)
River Subbasin:	N/A
Section:	1a
Class:	III
Special Standards:	None

Public Notice: The application and draft permit were given public notice according to the VPDES Permit Regulation and no comments were received.

Planning: The discharge is not addressed in any planning document but will be included when the plan is updated.

EPA Comments: EPA has waived the right to comment and/or object to the adequacy of the permit.

VDH Comments: By letter received April 22, 2008, the Virginia Department of Health stated that they had no objections to the permit.

Previous Board Action: None

Staff Comments: This permit reissuance is non-controversial. The staff believes that the attached effluent limitations will maintain the Water Quality Standards adopted by the Board.

Permit maintenance fees were last paid on October 29, 2007.

The permit was issued on February 4, 2003 and expired on February 3, 2008.

Basis for Effluent Limits: SWCB Water Quality Standards, Best Engineering Judgement

Licensed Operator Requirements: None

Staff Recommendations: The staff recommends that:

1. The attached effluent limitations and monitoring requirements by approved.

2. VPDES Permit No. VA0055409 be reissued.

APPROVED: _____
Water Permit Manager

DATE: 8/13/08

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Permit No. VA0055409
Effective Date: August 13, 2008
Expiration Date: August 12, 2013

AUTHORIZATION TO DISCHARGE UNDER THE VIRGINIA POLLUTANT DISCHARGE ELIMINATION SYSTEM AND THE VIRGINIA STATE WATER CONTROL LAW

In compliance with the provisions of the Clean Water Act as amended and pursuant to the State Water Control Law and regulations adopted pursuant thereto, the following owner is authorized to discharge in accordance with the information submitted with the permit application, and with this permit cover page, Part I - Effluent Limitations and Monitoring Requirements, and Part II – Conditions Applicable To All VPDES Permits, as set forth herein.

Owner: IMTT Holdings, Inc.
Facility Name: IMTT-Virginia West
County: Henrico
Facility Location: 5500 Old Osborne Turnpike

The owner is authorized to discharge to the following receiving stream:

Stream: Unnamed Tributary to James River
River Basin: James (Lower)
River Subbasin: N/A
Section: 1a
Class: III
Special Standards: None

Water Permit Manager, Piedmont Regional Office

8/13/08
Date

PERMITTEE NAME/ADDRESS(INCLUDE FACILITY NAME/LOCATION IF DIFFERENT)

NAME IMTT - Richmond West
ADDRESS 5500 Old Osborne Tpke
Richmond VA 23231
FACILITY LOCATION Osborne and Bickerstaff Rd

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM(NPDES)
DISCHARGE MONITORING REPORT(DMR)

Industrial Minor 08/07/2008

DEPT. OF ENVIRONMENTAL QUALITY
(REGIONAL OFFICE)
Piedmont Regional Office
4949-A Cox Road
Glen Allen VA 23060

NOTE: READ PERMIT AND GENERAL INSTRUCTIONS BEFORE COMPLETING THIS FORM.

VA0055409	001
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD

	YEAR	MO	DAY		YEAR	MO	DAY
FROM				TO			

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX.	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
001 FLOW	REPORTD				*********	*********	*********				
	REQRMNT	NL	NL	MGD	*********	*********	*********			1/M	EST
002 PH	REPORTD	*********	*********			*********					
	REQRMNT	*********	*********		6.0	*********	9.0	SU		1/M	GRAB
059 CARBON, TOTAL ORGANIC	REPORTD	*********	*********		*********	*********					
	REQRMNT	*********	*********		*********	*********	110.0	MG/L		1/M	GRAB
137 HARDNESS, TOTAL (AS CACO3)	REPORTD	*********	*********				*********				
	REQRMNT	*********	*********		NL	NL	*********	MG/L		1/YR	GRAB
196 ZINC, TOTAL RECOVERABLE	REPORTD	*********	*********		*********						
	REQRMNT	*********	*********		*********	30	30	UG/L		1/6M	GRAB
202 CADMIUM, TOTAL RECOVERABLE	REPORTD	*********	*********		*********						
	REQRMNT	*********	*********		*********	0.46	0.46	UG/L		1/6M	GRAB
203 COPPER, TOTAL RECOVERABLE	REPORTD	*********	*********		*********						
	REQRMNT	*********	*********		*********	3.9	3.9	UG/L		1/6M	GRAB
233 LEAD, TOTAL RECOVERABLE	REPORTD	*********	*********		*********						
	REQRMNT	*********	*********		*********	4.2	4.2	UG/L		1/6M	GRAB

ADDITIONAL PERMIT REQUIREMENTS OR COMMENTS

BYPASSES AND OVERFLOWS	TOTAL OCCURRENCES	TOTAL FLOW(M.G.)	TOTAL BOD5(K.G.)

I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS TO THE BEST OF MY KNOWLEDGE AND BELIEF TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS. SEE 18 U.S.C. & 1001 AND 33 U.S.C. & 1319. (Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)

OPERATOR IN RESPONSIBLE CHARGE			DATE		
TYPED OR PRINTED NAME	SIGNATURE	CERTIFICATE NO.	YEAR	MO.	DAY
PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT		TELEPHONE			
TYPED OR PRINTED NAME	SIGNATURE		YEAR	MO.	DAY

PERMITTEE NAME/ADDRESS(INCLUDE FACILITY NAME/LOCATION IF DIFFERENT)

NAME IMTT - Richmond West
ADDRESS 5500 Old Osborne Tpke
Richmond VA 23231
FACILITY LOCATION Osborne and Bickerstaff Rd

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM(NPDES)
DISCHARGE MONITORING REPORT(DMR)

Industrial Minor 08/07/2008

DEPT. OF ENVIRONMENTAL QUALITY
(REGIONAL OFFICE)
Piedmont Regional Office
4949-A Cox Road
Glen Allen VA 23060

NOTE: READ PERMIT AND GENERAL INSTRUCTIONS BEFORE COMPLETING THIS FORM.

VA0055409	001
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD

	YEAR	MO	DAY		YEAR	MO	DAY
FROM				TO			

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX.	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
257 PETROLEUM HYDROCARBONS, TOTAL RECOVI	REPORTD	*********	*********		*********	*********					
	REQRMNT	*********	*********		*********	*********	30.0	MG/L		1/M	GRAB
379 TOXICITY, FINAL, ACUTE	REPORTD	*********	*********		*********						
	REQRMNT	*********	*********		*********	1.0	1.0	TU-A		1/6M	GRAB
	REPORTD										
	REQRMNT									*******	
	REPORTD										
	REQRMNT									*******	
	REPORTD										
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	REPORTD										
	REQRMNT									*******	
	REPORTD										
	REQRMNT									*******	

ADDITIONAL PERMIT REQUIREMENTS OR COMMENTS

BYPASSES AND OVERFLOWS	TOTAL OCCURRENCES	TOTAL FLOW(M.G.)	TOTAL BOD5(K.G.)

I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS TO THE BEST OF MY KNOWLEDGE AND BELIEF TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS. SEE 18 U.S.C. & 1001 AND 33 U.S.C. & 1319. (Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)

OPERATOR IN RESPONSIBLE CHARGE			DATE		
TYPED OR PRINTED NAME	SIGNATURE	CERTIFICATE NO.	YEAR	MO.	DAY
PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT		TELEPHONE			
TYPED OR PRINTED NAME	SIGNATURE		YEAR	MO.	DAY

THIS REPORT IS REQUIRED BY LAW (33 U. S. C. § 1318 40 CFR 122.41(l)(4)(i)). FAILURE TO REPORT OR FAILURE TO REPORT TRUTHFULLY CAN RESULT IN CIVIL PENALTIES NOT TO EXCEED $10,000 PER DAY OF VIOLATION: OR IN CRIMINAL PENALTIES NOT TO EXCEED $25,000 PER DAY OF VIOLATION OR BY IMPRISONMENT FOR NOT MORE THAN FIVE YEARS, OR BOTH.

GENERAL INSTRUCTIONS

1. Complete this form in permanent ink or indelible pencil.
2. Be sure to enter the dates for the first and last day of the period covered by the report on the form in the space marked "Monitoring Period".
3. For those parameters where the "permit requirement" spaces are blank or a limitation appears, provide data in the "reported" spaces in accordance with your permit.
4. Enter the average and, if appropriate, maximum quantities and units in the "reported" spaces in the columns marked "Quantity or Loading". KG/DAY = Concentration(mg/l) x Flow(MGD) x 3.785.
5. Enter maximum, minimum, and/or average concentrations and units in the "reported" spaces in the columns marked "Quality or Concentration".
6. Enter the number of samples which do not comply with the maximum and /or minimum permit requirements in the "reported" space in the column marked "No. Ex.".
7. Enter the actual frequency of analysis for each parameter (number of times per day, week, month) in the "reported" space in the column marked "Frequency of Analysis".
8. Enter the actual type of sample collected for each parameter in the "reported" space in the column marked "Sample Type".
9. Enter additional required data or comments in the space marked "additional permit requirements or comments".
10. Record the number of bypasses during the month, the total flow in million gallons and BOD5 in kilograms in the proper columns in the section marked "Bypasses and Overflows".
11. The operator in responsible charge of the facility should review the form and sign in the space provided. If the plant is required to have a licensed operator, the operator's certificate number should be reported in the space provided.
12. The principal executive officer should then review the form and sign in the space provided and provide a telephone number where he/she can be reached.
13. You are required to sample at the frequency and type indicated in your permit.
14. Send the completed form to your Dept. of Environmental Quality Regional Office by the 10th of each month.
15. You are required to retain a copy of the report for your records.
16. Where violations of permit requirements are reported, attach a brief explanation in accordance with the permit requirements describing causes and corrective actions taken. Reference each violation by date.
17. If you have any questions, contact the Dept. of Environmental Quality Regional Office.

A. Limitations and Monitoring Requirements

During the period beginning with the permit's effective date and lasting until the permit's expiration date, the permittee is authorized to discharge from outfall serial number 001, Retention Pond.

1. Such discharges shall be monitored by the permittee as specified below:

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	WEEKLY AVERAGE	MINIMUM	MAXIMUM	FREQUENCY	SAMPLE TYPE
Flow (MGD)	NA	NA	NA	NL	1/month	Estimate
TPH (mg/L) [b]	NA	NA	NA	15	1/month	Grab
pH (standard units)	NA	NA	6.0	9.0	1/month	Grab
Total Organic Carbon (mg/L)[a]	NA	NA	NA	110	1/month	Grab
Total Recoverable Cadmium (µg/L) [c]	0.46	NA	NA	0.46	1/ 6 months	Grab
Total Recoverable Copper (µg/L) [c]	3.9	NA	NA	3.9	1/ 6 months	Grab
Total Recoverable Zinc (µg/L) [a][c]	30	NA	NA	30	1/ 6 months	Grab
Total Recoverable Lead (µg/L) [c][d]	4.2	NA	NA	4.2	1/6 months	Grab
WET Limit (TUa) [c]	1.0	NA	NA	1.0	1/ 6 months	Grab
Hardness	NL	NA	NL	NA	1/ Year	Grab

"NL" means no limitation is established. Monitoring and reporting, however, are required.
"NA" means not applicable.

(a) These limitations are expressed in two significant digits.
(b) TPH shall be analyzed using EPA SW 846 Method 8015C for diesel range organics, or by EPA SW 846 Method 8270D. If Method 8270D is used, the lab must report the total of diesel range organics and polynuclear aromatic hydrocarbons.
(c) The permittee shall supply the testing results for Copper, Zinc, Cadmium, and Lead as well as provide results for WET testing as specified in Part I.B.7. in accordance with the dates listed below:

Period	DMR Due Date	Period	DMR Due Date
Semi-Annual 1	December 10, 2008	Semi-Annual 6	June 10, 2011
Semi-Annual 2	June 10, 2009	Semi-Annual 7	December 10, 2011
Semi-Annual 3	December 10, 2009	Semi-Annual 8	June 10, 2012
Semi-Annual 4	June 10, 2010	Semi-Annual 9	December 10, 2012
Semi-Annual 5	December 10, 2010	Semi-Annual 10	June 10, 2013

Test results shall be submitted along with the DMR for the month in which the test results were received by the permittee.
(d) See Part I.B.9 for Compliance Schedule.

2. Effluent samples shall be taken at Outfall 001
3. See Part I.B.7 for WET Limitations and Monitoring Requirements
4. See Part I.B.5.for discharge of hydrostatic test waters
5. There shall be no discharge of floating solids or visible foam in other than trace amounts.
6. There shall be no discharge of tank bottom waters

B. OTHER REQUIREMENTS OR SPECIAL CONDITIONS

1. Notification Levels

The permittee shall notify the Department as soon as they know or have reason to believe:

a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following notification levels:
   (1) One hundred micrograms per liter (100 µg/L);
   (2) Two hundred micrograms per liter (200 µg/L) for acrolein and acrylonitrile; five hundred micrograms per liter (500 µg/L) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1.0 mg/L) for antimony;
   (3) Five (5) times the maximum concentration value reported for that pollutant in the permit application; or
   (4) The level established by the Board.
b. That any activity has occurred or will occur which would result in any discharge, on a nonroutine or infrequent basis, of a toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following notification levels:
   (1) Five hundred micrograms per liter (500 µg/L);
   (2) One milligram per liter for antimony (1.0 mg/L);
   (3) Ten (10) times the maximum concentration value reported for that pollutant in the permit application; or
   (4) The level established by the Board.

2. Operation and Maintenance Manual Requirement

The permittee shall review the existing Operations and Maintenance (O & M) Manual and notify the DEQ Regional Office in writing within 90 days of the effective date of this permit whether it is still accurate and complete. If the O & M Manual is no longer accurate and complete, a revised O & M Manual shall be submitted for approval to the DEQ Regional Office within 90 days of the effective date of this permit or with the above required notification. The permittee will maintain an accurate, approved operation and maintenance manual for the treatment works. This manual shall detail the practices and procedures which will be followed to ensure compliance with the requirements of the permit. The permittee shall operate the treatment works in accordance with the approved O&M Manual. This manual shall include, but not necessarily be limited to, the following items, as appropriate:

a. Techniques to be employed in the collection, preservation, and analysis of effluent samples;
b. Discussion of Best Management Practices, if applicable;
c. Treatment works design, treatment works operation, routine preventative maintenance of units within the treatment system, critical spare parts inventory and record keeping;
d. A plan for the management and/or disposal of waste solids and residues;
e. Procedures for handling, storing, and disposing of all wastes, fluids, and pollutants characterized in Part I.B.3 that will prevent these materials from reaching state waters; and
f. Procedures for measuring and recording the duration and volume of treated wastewater discharged.

Any changes in the practices and procedures followed by the permittee shall be documented and submitted for staff approval within 90 days of the effective date of the changes. Upon approval of the submitted manual changes, the revised manual becomes an enforceable part of the permit. Noncompliance with the O & M Manual shall be deemed a violation of the permit.

3. Materials Handling/Storage

Any and all product, materials, industrial wastes, and/or other wastes resulting from the purchase, sale, mining, extraction, transport, preparation, and/or storage of raw or

intermediate materials, final product, by-product or wastes, shall be handled, disposed of, and/or stored in such a manner so as not to permit a discharge of such product, materials, industrial wastes, and/or other wastes to State waters, except as expressly authorized.

4. Compliance Reporting

The maximum quantification levels (QL) shall be as follows:

Effluent Characteristic	Quantification Level
Total Recoverable Cadmium	0.30 µg/L
Total Recoverable Copper	1.6 µg/L
Total Recoverable Zinc	12 µg/L
Total Recoverable Lead	1.6 µg/L

Monthly Average -- Compliance with the monthly average limitations and/or reporting requirements for the parameters listed in a. above shall be determined as follows: All concentration data below the QL listed in a. above shall be treated as zero. All concentration data equal to or above the QL listed in a. above shall be treated as it is reported. An arithmetic average shall be calculated using all reported data for the month, including the defined zeros. This arithmetic average shall be reported on the Discharge Monitoring Report (DMR) as calculated. If all data are below the QL, then the average shall be reported as "<QL". If reporting for quantity is required on the DMR and the calculated concentration is <QL, then report "<QL" for the quantity. Otherwise use the concentration data and flow data for each sample day to determine the daily quantity and report the average of the calculated daily quantities.

Daily Maximum -- Compliance with the daily maximum limitations and/or reporting requirements for the parameters listed in a. above shall be determined as follows: All concentration data below the QL listed in a. above shall be treated as zero. All concentration data equal to or above the QL listed in a. above shall be treated as reported. An arithmetic average shall be calculated using all reported data, including the defined zeros, collected within each day during the reporting month. The maximum value of these daily averages thus determined shall be reported on the DMR as the Daily Maximum. If all data are below the QL, then the maximum value of the daily averages shall be reported as "<QL". If reporting for quantity is required on the DMR and the calculated daily maximum is <QL, then report "<QL" for the quantity. Otherwise use the daily average concentrations and corresponding daily flows to determine daily average quantities and report the maximum of the daily average quantities.

Single Datum – Any single datum required shall be reported as "<QL" if it is less than the QL in section a. above. Otherwise the numerical value shall be reported.

Significant Digits -- The permittee shall report at least the same number of significant digits as the permit limit for a given parameter. Regardless of the rounding convention used by the permittee (i.e., 5 always rounding up or to the nearest even number), the permitttee shall use the convention consistently, and shall ensure that consulting laboratories employed by the permittee use the same convention.

5. Hydrostatic Testing

The permittee shall obtain approval from the DEQ Regional Office forty-eight (48) hours in advance of any discharge resulting from hydrostatic testing. The conditions of approval will be contingent on the volume and duration of the proposed discharge, and the nature of the residual product. Every discharge of hydrostatic testing waters shall be monitored and limited as specified below. Sampling will be required within the first thirty (30) minutes of discharge by grab sample. Report results with the DMR for the month in which sampling and

hydrostatic testing occurred. The hydrostatic test water sample shall be taken prior to combining with any other waters.

During the periods that hydrostatic pressure testing water is being discharged, flow shall be estimated once per discharge day (1/D-Day). TPH, Benzene, Toluene, Ethylbenzene, Total Xylenes, Naphthalene, Total Recoverable Lead, and TRC limitations, as follows, shall be effective, and pH shall be monitored once per day. These limitations and monitoring requirements shall be effective only during the discharge of hydrostatic pressure testing water. The effluent shall be free of sheens and odors. There shall be no discharge of foam or floating solids in other than trace amounts. See Part I.B.4 for reporting instructions.

Such discharges shall be limited as follows:

Parameter	Discharge Maximum Limititation	Maximum Quantification Level ††
TPH (1)	15 mg/L	5.0 mg/L
Benzene (2)	50 µg/L	10 µg/L
Toluene (2)	175 µg/L	10 µg/L
Ethylbenzene (2)	320 µg/L	10 µg/L
Total Xylenes (2)	33 µg/L	6.0 µg/L
Naphthalene (3)	10 µg/L	----
Total Recoverable Lead (4)	0.41 µg/L	10 µg/L
Total Residual Chlorine	0.011 mg/L	0.10 mg/L
Total Organic Carbon †	NL	5.0 mg/L
Total Suspended Solids †	NL	1 mg/L
pH (5)	6.0 SU - 9.0 SU	----
MTBE †	NL	1 mg/L
Ethanol (6) †	NL	100 µg/L
Ethylene Dibromide (EDB) (4) †	NL	5.0 µg/L
1,2-Dichloroethane (4) †	NL	100 µg/L
Hardness †	NL	0.1 mg/L

Footnotes:

(1) TPH is the sum of individual gasoline range organics and diesel range organics or TPH-GRO and TPH-DRO to be measured by EPA SW 846 Method 8015C (2007) for gasoline and diesel range organics, or by EPA SW 846 Methods 8260B and 8270D (2007). If the combination of Methods 8260B and 8270C is used, the lab must report the total of gasoline range organics, diesel range organics and polynuclear aromatic hydrocarbons.

(2) Benzene, Toluene, Ethylbenzene, Total Xylenes and MTBE shall be analyzed according to a current and appropriate EPA Method (40 CFR Part 136, 2007) or EPA SW 846 Method 8021B (1996).

(3) Monitoring required only on discharges from tanks containing aviation gasoline, jet fuel, or diesel fuel. Naphthalene shall be analyzed by a current and appropriate EPA Wastewater Method from 40 CFR Part 136 (2007) or a current and appropriate EPA SW 846 Method.

(4) Monitoring for this parameter is required only when residual product has the potential to contain leaded fuel. Lead shall be analyzed according to a current and appropriate EPA Wastewater Method (40 CFR Part 136, 2007) or EPA SW 846 Method 9040C. 1,2 Dichloroethane and EDB shall be analyzed by a current and appropriate EPA SW 846 Method or EPA Wastewater Method from 40 CFR Part 136 (2007).

(5) This limitation is expressed as the range between an instantaneous minimum of 6.0 SU and an instantaneous maximum of 9.0 SU

(6) Monitoring for ethanol is only required when residual product has the potential to contain gasoline containing greater than 10% ethanol. Ethanol shall be analyzed according to EPA SW 846 Method 8015C or EPA SW 846 Method 8260B.

† "NL" means no limitation is established. Monitoring and reporting, however, are required.

†† Quantification level (QL) is defined as the lowest concentration used for the calibration of a measurement system when the calibration is in accordance with the procedures published for the required method. Quality control and quality assurance information shall be submitted to document that the required quantification level has been attained.

6. Oil Storage Ground Water Monitoring Reopener

As this facility currently manages ground water in accordance with 9 VAC 25-91-10 et seq., the Facility and Aboveground Storage Tank Regulation, this permit does not presently impose ground water monitoring requirements. However, this permit may be modified or alternately revoked and reissued to include ground water monitoring not required by this regulation.

7. Whole Effluent Toxicity (WET) Limitation and Monitoring Requirements

a. The Whole Effluent Toxicity limitation of NOAEC = 100% (TUa=1.0) in Part I.A. is a limit that shall be implemented as specified below:

(1) The permittee shall conduct semi-annual acute toxicity testing using grab samples of final effluent from outfall 001. The acute tests to use are:

48-Hour Static Acute Test using *Ceriodaphnia dubia*
48-Hour Static Acute Test using *Pimephales promelas*

(2) These acute tests are to be conducted using a minimum of 4 replicates with 5 organisms each, for the control and effluent. The NOAEC (No Observed Adverse Effect Concentration) shall be reported either as 100% or <100% (less than 100%). The effluent will be in compliance if the survival of the test organisms in both the control and the 100% effluent exposures equals or exceeds 90%. If the survival in the effluent is less and this value is significantly different from the control survival, as determined by the hypotheses testing, the NOAEC is less than 100% and the effluent is not in compliance. Tests in which control survival is less than 90% are not acceptable.

(3) Two copies of the toxicity test results shall be submitted with the DMR. Test procedures and reporting shall be in accordance with the WET testing methods cited in 40 CFR 136.6.

b. This permit may be modified or revoked and reissued to include pollutant specific limits in lieu of a WET limit should it be demonstrated that toxicity is due to specific parameters. The pollutant specific limits must control the toxicity.

8. Total Maximum Daily Load (TMDL) Reopener
This permit shall be modified or alternatively revoked and reissued if any approved wasteload allocation procedure, pursuant to Section 303(d) of the Clean Water Act, imposes wasteload allocations, limits or conditions on the facility that are not consistent with the permit requirements.

9. Schedule of Compliance
The permittee shall achieve compliance with the final limitation and monitoring requirements for Lead in Part I.A. in accordance with the following schedule:

1. Prepare Progress Reports	Annually from the effective date of the permit
2. Achieve Compliance with Final Effluent Limitation	Within 3 years after the effective date of the permit reissuance.

No later than 14 calendar days following all compliance dates identified in the above schedule of compliance, the permittee shall submit to the DEQ Regional Office, either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance. In the latter case, the notice shall include the cause of noncompliance, any remedial action taken, and the probability of meeting the next scheduled requirement.

10. Water Quality Monitoring
The permittee shall monitor the effluent at Outfall 001 for the parameters as listed in the chart below according to the indicated analysis number, **quantification level**, reporting units, and sample type. The data shall be submitted via the laboratory report within one (1) year of this permit's effective date. In addition to the laboratory report, a statement shall also be submitted referencing this permit requirement. Monitoring and analysis shall be conducted in accordance with 40 CFR Part 136 or alternative EPA approved methods. It is the

responsibility of the permittee to ensure that proper QA/QC protocols are followed during the sample gathering and analytical procedures. The DEQ will use this datum for making specific permit decisions in the future. This permit may be modified or, alternatively, revoked and reissued to incorporate limits for any of the parameters in the chart below.

Water Quality Monitoring			
CHEMICAL	**EPA Analysis No.**	**QUANTIFICATION LEVEL**	**SAMPLE TYPE**
Strontium 90 (pCi/L)	905.0	≤ 8 pCi/L	Grab
Tritium (pCi/L)	906.0	≤20000 pCi/L	Grab
Beta Particle & Photon Activity (mrem/yr)	900.0	No QL – Must be reported in exposure units (mrem/yr)	Grab
Gross Alpha Particle Activity (pCi/L)	900.0	≤15 pCi.L	Grab
Thalium, dissolved (µg/L)	Any approved method presented in 40 CFR 136	Discretion of the permittee	Grab

11. Water Quality Criteria Reopener

Should effluent monitoring indicate the need for any water quality-based limitations, this permit may be modified or alternatively revoked and reissued to incorporate appropriate limitations.

CONDITIONS APPLICABLE TO ALL VPDES PERMITS

A. Monitoring

1. Samples and measurements taken as required by this permit shall be representative of the monitored activity.

2. Monitoring shall be conducted according to procedures approved under Title 40 Code of Federal Regulations Part 136 or alternative methods approved by the U.S. Environmental Protection Agency, unless other procedures have been specified in this permit.

3. The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals that will insure accuracy of measurements.

B. Records

1. Records of monitoring information shall include:
   a. The date, exact place, and time of sampling or measurements;
   b. The individual(s) who performed the sampling or measurements;
   c. The date(s) and time(s) analyses were performed;
   d. The individual(s) who performed the analyses;
   e. The analytical techniques or methods used; and
   f. The results of such analyses.

2. Except for records of monitoring information required by this permit related to the permittee's sewage sludge use and disposal activities, which shall be retained for a period of at least five years, the permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report or application. This period of retention shall be extended automatically during the course of any unresolved litigation regarding the regulated activity or regarding control standards applicable to the permittee, or as requested by the Board.

C. Reporting Monitoring Results

1. The permittee shall submit the results of the monitoring required by this permit not later than the 10th day of the month after monitoring takes place, unless another reporting schedule is specified elsewhere in this permit. Monitoring results shall be submitted to:

   DEQ - Piedmont Regional Office
   4949-A Cox Road
   Glen Allen, VA 23060

2. Monitoring results shall be reported on a Discharge Monitoring Report (DMR) or on forms provided, approved, or specified by the Department.

3. If the permittee monitors any pollutant specifically addressed by this permit more frequently than required by this permit using test procedures approved under Title 40 of the Code of Federal Regulations Part 136 or using other test procedures approved by the U.S. Environmental Protection Agency or using procedures specified in this permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR or reporting form specified by the Department.

4. Calculations for all limits which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified in this permit.

D. Duty to Provide Information

The permittee shall furnish to the Department, within a reasonable time, any information which the Board may request to determine whether cause exists for modifying, revoking and reissuing,

or terminating this permit or to determine compliance with this permit. The Board may require the permittee to furnish, upon request, such plans, specifications, and other pertinent information as may be necessary to determine the effect of the wastes from his discharge on the quality of state waters, or such other information as may be necessary to accomplish the purposes of the State Water Control Law. The permittee shall also furnish to the Department upon request, copies of records required to be kept by this permit.

E. Compliance Schedule Reports

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

F. Unauthorized Discharges

Except in compliance with this permit, or another permit issued by the Board, it shall be unlawful for any person to:

1. Discharge into state waters sewage, industrial wastes, other wastes, or any noxious or deleterious substances; or

2. Otherwise alter the physical, chemical or biological properties of such state waters and make them detrimental to the public health, or to animal or aquatic life, or to the use of such waters for domestic or industrial consumption, or for recreation, or for other uses.

G. Reports of Unauthorized Discharges.

Any permittee who discharges or causes or allows a discharge of sewage, industrial waste, other wastes or any noxious or deleterious substance into or upon state waters in violation of Part II F 1; or who discharges or causes or allows a discharge that may reasonably be expected to enter state waters in violation of Part II F 1, shall notify the Department of the discharge immediately upon discovery of the discharge, but in no case later than 24 hours after said discovery. A written report of the unauthorized discharge shall be submitted to the Department, within five days of discovery of the discharge. The written report shall contain:

1. A description of the nature and location of the discharge;

2. The cause of the discharge;

3. The date on which the discharge occurred;

4. The length of time that the discharge continued;

5. The volume of the discharge;

6. If the discharge is continuing, how long it is expected to continue;

7. If the discharge is continuing, what the expected total volume of the discharge will be; and

8. Any steps planned or taken to reduce, eliminate and prevent a recurrence of the present discharge or any future discharges not authorized by this permit. Discharges reportable to the Department under the immediate reporting requirements of other regulations are exempted from this requirement.

H. Reports of Unusual or Extraordinary Discharges

If any unusual or extraordinary discharge including a bypass or upset should occur from a treatment works and the discharge enters or could be expected to enter state waters, the permittee shall promptly notify, in no case later than 24 hours, the Department by telephone after the discovery of the discharge. This notification shall provide all available details of the incident, including any adverse affects on aquatic life and the known number of fish killed. The permittee shall reduce the report to writing and shall submit it to the Department within five days of discovery of the discharge in accordance with Part II I 2. Unusual and extraordinary discharges include but are not limited to any discharge resulting from:

1. Unusual spillage of materials resulting directly or indirectly from processing operations;

2. Breakdown of processing or accessory equipment;

3. Failure or taking out of service some or all of the treatment works; and

4. Flooding or other acts of nature.

I. Reports of Noncompliance

The permittee shall report any noncompliance which may adversely affect state waters or may endanger public health.

1. An oral report shall be provided within 24 hours from the time the permittee becomes aware of the circumstances. The following shall be included as information which shall be reported within 24 hours under this paragraph:
   a. Any unanticipated bypass; and
   b. Any upset which causes a discharge to surface waters.

2. A written report shall be submitted within 5 days and shall contain:
   a. A description of the noncompliance and its cause;
   b. The period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and
   c. Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

   The Board may waive the written report on a case-by-case basis for reports of noncompliance under Part II I. if the oral report has been received within 24 hours and no adverse impact on state waters has been reported.

3. The permittee shall report all instances of noncompliance not reported under Parts II I.1 or 2, in writing, at the time the next monitoring reports are submitted. The reports shall contain the information listed in Part II I.2.

NOTE: The immediate (within 24 hours) reports required in Parts II G, H and I may be made to the Department's Regional Office at (804) 527-5020 or fax (804) 527-5106. For reports outside normal working hours, leave a message and this shall fulfill the immediate reporting requirement. For emergencies, the Virginia Department of Emergency Services maintains a 24 hour telephone service at 1-800-468-8892.

J. Notice of Planned Changes

1. The permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility. Notice is required only when:
   a. The permittee plans alteration or addition to any building, structure, facility, or installation from which there is or may be a discharge of pollutants, the construction of which commenced:
      (1) After promulgation of standards of performance under Section 306 of Clean Water Act which are applicable to such source; or
      (2) After proposal of standards of performance in accordance with Section 306 of Clean Water Act which are applicable to such source, but only if the standards are promulgated in accordance with Section 306 within 120 days of their proposal;

   b. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations nor to notification requirements specified elsewhere in this permit; or

   c. The alteration or addition results in a significant change in the permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the

application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan.

2. The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

K. Signatory Requirements

1. Applications. All permit applications shall be signed as follows:
   a. For a corporation: by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (i) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulation; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures;

   b. For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or

   c. For a municipality, state, federal, or other public agency: By either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a public agency includes: (i) The chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency.

2. Reports, etc. All reports required by permits, and other information requested by the Board shall be signed by a person described in Part II K 1, or by a duly authorized representative of that person. A person is a duly authorized representative only if:
   a. The authorization is made in writing by a person described in Part II K 1;

   b. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and

   c. The written authorization is submitted to the Department.

3. Changes to authorization. If an authorization under Part II K 2 is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of Part II K 2 shall be submitted to the Department prior to or together with any reports, or information to be signed by an authorized representative.

4. Certification. Any person signing a document under Parts II K 1 or 2 shall make the following certification:
   "I certify under penalty of law that this document and all attachments were prepared

under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

L. Duty to Comply

The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the State Water Control Law and the Clean Water Act, except that noncompliance with certain provisions of this permit may constitute a violation of the State Water Control Law but not the Clean Water Act. Permit noncompliance is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

The permittee shall comply with effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under Section 405(d) of the Clean Water Act within the time provided in the regulations that establish these standards or prohibitions or standards for sewage sludge use or disposal, even if this permit has not yet been modified to incorporate the requirement.

M. Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee shall apply for and obtain a new permit. All permittees with a currently effective permit shall submit a new application at least 180 days before the expiration date of the existing permit, unless permission for a later date has been granted by the Board. The Board shall not grant permission for applications to be submitted later than the expiration date of the existing permit.

N. Effect of a Permit

This permit does not convey any property rights in either real or personal property or any exclusive privileges, nor does it authorize any injury to private property or invasion of personal rights, or any infringement of federal, state or local law or regulations.

O. State Law

Nothing in this permit shall be construed to preclude the institution of any legal action under, or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any other state law or regulation or under authority preserved by Section 510 of the Clean Water Act. Except as provided in permit conditions on "bypassing" (Part II U), and "upset" (Part II V) nothing in this permit shall be construed to relieve the permittee from civil and criminal penalties for noncompliance.

P. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Sections 62.1-44.34:14 through 62.1-44.34:23 of the State Water Control Law.

Q. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes effective plant performance, adequate funding, adequate licensed operator staffing, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by the permittee only when the operation is necessary to achieve compliance with the conditions of this permit.

R. Disposal of Solids or Sludges

Solids, sludges or other pollutants removed in the course of treatment or management of pollutants shall be disposed of in a manner so as to prevent any pollutant from such materials from entering state waters.

S. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

T. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

U. Bypass

1. "Bypass" means the intentional diversion of waste streams from any portion of a treatment facility. The permittee may allow any bypass to occur which does not cause effluent limits to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of Parts II U 2 and U 3.

2. Notice
   a. Anticipated bypass. If the permittee knows in advance of the need for a bypass, prior notice shall be submitted, if possible at least ten days before the date of the bypass.
   b. Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in Part II I.

3. Prohibition of bypass.
   a. Bypass is prohibited, and the Board may take enforcement action against a permittee for bypass, unless:
      (1) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
      (2) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
      (3) The permittee submitted notices as required under Part II U 2.

   b. The Board may approve an anticipated bypass, after considering its adverse effects, if the Board determines that it will meet the three conditions listed above in Part II U 3 a.

V. Upset

1. An upset constitutes an affirmative defense to an action brought for noncompliance with technology based permit effluent limits if the requirements of Part II V 2 are met. A determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is not a final administrative action subject to judicial review.

2. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
   a. An upset occurred and that the permittee can identify the cause(s) of the upset;
   b. The permitted facility was at the time being properly operated; and
   c. The permittee submitted notice of the upset as required in Part II I 2.

d. The permittee complied with any remedial measures required under Part II S.

3. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

W. Inspection and Entry

The permittee shall allow the Director, or an authorized representative, upon presentation of credentials and other documents as may be required by law, to:

1. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

3. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

4. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Clean Water Act and the State Water Control Law, any substances or parameters at any location.

For purposes of this section, the time for inspection shall be deemed reasonable during regular business hours, and whenever the facility is discharging. Nothing contained herein shall make an inspection time unreasonable during an emergency.

X. Permit Actions

Permits may be modified, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Y. Transfer of Permits

1. Permits are not transferable to any person except after notice to the Department. Except as provided in Part II Y 2, a permit may be transferred by the permittee to a new owner or operator only if the permit has been modified or revoked and reissued, or a minor modification made, to identify the new permittee and incorporate such other requirements as may be necessary under the State Water Control Law and the Clean Water Act.

2. As an alternative to transfers under Part II Y 1, this permit may be automatically transferred to a new permittee if:
   a. The current permittee notifies the Department at least 30 days in advance of the proposed transfer of the title to the facility or property;
   b. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility, coverage, and liability between them; and
   c. The Board does not notify the existing permittee and the proposed new permittee of its intent to modify or revoke and reissue the permit. If this notice is not received, the transfer is effective on the date specified in the agreement mentioned in Part II Y 2 b.

Z. Severability

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

VPDES PERMIT FACT SHEET

This document gives pertinent information concerning the **reissuance** of the VPDES permit listed below. This permit is being processed as a **Minor,** Industrial permit. The effluent limitations contained in this permit will maintain the Water Quality Standards of 9 VAC 25-260 et seq. The controlled discharge is a result of stormwater runoff from a bulk petroleum storage facility that is collected and passed through an onsite oil/water separator (SIC Code: 4226). This permit action consists of revising new and existing limitations, and updating special conditions.

1. **Facility Name and Address**: IMTT-Virginia West
5500 Old Osborne Turnpike
Richmond, VA 23231

Location: 5500 Old Osborne Turnpike

2. Permit No. VA0055409
Existing Permit Expiration Date: February 3, 2008

3. Contact Name: David Ryan
Title: Project Manager/CSM/FSO
Owner: IMTT Holdings, Inc.
Owner Address: 321 Saint Charles Ave., New Orleans, LA 70130
Telephone No: (757) 485-3000

4. Application Complete Date: March 20, 2008
Permit Drafted By: Jeremy Kazio Date: March 27, 2008 Piedmont Regional Office

Reviewed By: Emilee Carpenter Date: April 2, 2008

Ray Jenkins Date: April 22, 2008

Public Comment Period Dates: from July 2, 2008 to August 4, 2008
Published Dates: July 2, 2008 and July 9, 2008

5. Receiving Stream Name: UT James River
Basin: James (lower)
Subbasin: N/A
Section: 1a
Class: III
Special Standards: None
River Mile: 5AXAQ000.15
7-Day, 10-Year Low Flow (7Q10): 0 MGD
1-Day, 10-Year Low Flow (1Q10): 0 MGD
30-Day, 5-Year Low Flow (30Q5): 0 MGD
30-Day, 10-Year Low Flow (30Q10): 0 MGD
7Q10 High Flow months: 0 MGD
1Q10 High Flow months: 0 MGD
Harmonic Mean Flow (HM): 0 MGD

Tidal? NO On 303(d) list? NO

6. **Operator License Requirements**: Not Applicable.

7. **Reliability Class**: Not Applicable

8. **Permit Characterization**:

( ) Issuance
(X) Reissuance
( ) Revoke & Reissue
( ) Owner Modification
( ) Board Modification
( ) Change of Ownership/Name
Effective Date:
( ) Municipal
SIC Code(s):
(X) Industrial
SIC Code(s): 4226
( ) POTW
( ) PVOTW
(X) Private
( ) Federal
( ) State

(X) Existing Discharge
( ) Proposed Discharge
(X) Effluent Limited
(X) Water Quality Limited
( ) WET Limit
( ) Interim Limits in Permit
( ) Interim Limits in Other Document (attached)
(X) Compliance Schedule Required
( ) Site Specific WQ Criteria
( ) Variance to WQ Standards
( ) Water Effects Ratio
( ) Discharge to 303(d) Listed Segment
(X) Toxics Management Program Required
( ) Toxics Reduction Evaluation
( ) Possible Interstate Effect
( ) Storm Water Management Plan

9. **Discharge Description**

TABLE I – Discharge Description

OUTFALL NUMBER	DISCHARGE SOURCE	TREATMENT	FLOW
001	Stormwater runoff from petroleum storage tank bermed area, truck unloading area, and truck loading rack area. The stormwater runoff is held in the bermed area until the permittee deems it necessary to discharge these waters, at which point the discharged waters are treated as indicated in this chart.	Oil/Water Separator, activated carbon box, and sedimentation pond	0.005 MGD

See Attachment A for facility diagram.

10. **Sewage Sludge Use or Disposal**: Not Applicable

11. **Discharge Location Description:**
See Attachment A for topographic maps and aerial photographs of IMTT-Virginia West and surrounding area.

Map Name: Richmond (126C) Quadrangle

12. **Material Storage**:
Bulk storage of petroleum products onsite. Area surrounding above-ground tanks is bermed and runoff is directed to an oil/water separator via a control valve.

13. **Ambient Water Quality Information**:
Ambient water quality data is not needed because the receiving stream is dry at the theoretical low flows used in permit limitation development.

14. **Antidegradation Review & Comments**: Tier 1 **X** Tier 2 _____ Tier 3 _____
The State Water Control Board's Water Quality Standards includes an antidegradation policy (9 VAC 25-260-30). All state surface waters are provided one of three levels of antidegradation protection. For Tier 1 or existing use protection, existing uses of the water body and the water quality to protect those uses must be maintained. Tier 2 water bodies have water quality that is better than the water quality standards. Significant lowering of the

water quality of Tier 2 waters is not allowed without an evaluation of the economic and social impacts. Tier 3 water bodies are exceptional waters and are so designated by regulatory amendment. The antidegradation policy prohibits new or expanded discharges into exceptional waters.

The anti-degradation review begins with a Tier determination. The receiving stream flowing to the James River is determined to be a Tier 1 waterbody. The stream is considered Tier 1 due to its naturally ephemeral flow. This determination is based on the intermittent nature of the stream where beneficial uses cannot be fully attained. (See **Attachment B** for Flow Frequency Memorandum by Jennifer V. Palmore, P.G. dated January 23, 2008)

15. **Site Inspection**: Date: 19 December 2007 Performed by: Jeremy Kazio
(See **Attachment C**)

16. **Effluent Screening & Limitation Development**:

TABLE 2 – Effluent Limitations and Bases

PARAMETER	BASIS FOR LIMITS	DISCHARGE LIMITS				MONITORING REQUIREMENTS	
		MO AVG	WE AVG	MIN	MAX	FREQ	SAMPLE TYPE
Flow (MGD)	NA	NA	NA	NA	NL	1/month	Estimate
TPH (mg/L)	2	NA	NA	NA	15	1/month	Grab
pH (standard units)	1	NA	NA	6.0	9.0	1/month	Grab
Total Organic Carbon (mg/L)	2	NA	NA	NA	110	1/month	Grab
Total Recoverable Cadmium (µg/L)	1	0.46	NA	NA	0.46	1/ 6 months	Grab
Total Recoverable Copper (µg/L)	1	3.9	NA	NA	3.9	1/ 6 months	Grab
Total Recoverable Zinc (µg/L)	1	30	NA	NA	30	1/ 6 months	Grab
Total Recoverable Lead (µg/L)	1	4.2	NA	NA	4.2	1/ 6 months	Grab
WET Limit (TUa)	1	1.0	NA	NA	1.0	1/ 6 months	Grab
Hardness (mg/L)	2	NL	NA	NL	NA	1/ Year	Grab

1. Water Quality Based Effluent Limitations 2. Best Professional Judgment (Technology Based Limits)

- **Water Quality Based Limitations**: A limitation evaluation begins by determining chronic and acute wasteload allocations (WLA's) using the MSTRANTI Excel Spreadsheet. MSTRANTI produces WLA's using data inputs determined by the permit writer and the Virginia Water Quality Standards (9 VAC 25-260 et. seq.). Once determined, the chronic and acute WLA's are entered into the STATS 2.0.4 computer application along with the appropriate quantification level (QL) and at least one data point. The output from the STATS 2.0.4 application will indicate the need for a permit limitation and calculate that limitation if required.

  a. Outfall 001 discharges to an intermittent stream that does not flow during dry weather. As a result, the statistical low flow characteristics of the receiving stream cannot be calculated, and a 100% mix is assumed. Therefore, the inputs required by MSTRANTI pertaining to pH, hardness, and temperature, for both

effluent quality and stream quality, are considered equal for the purposes of this permit evaluation.

b. Pollutants believed present in application 2C include Oil & Grease and BTEX (Benzene, Toluene, Ethylbenzene, and Total Xylenes). Test results for BTEX indicated that the concentrations of each parameter were less than the Quantification Level (QL) that DEQ considers low enough for each of these pollutants to be considered absent from the facility's effluent. Oil & Grease was indicated at a concentration below a QL of 10 mg/L, which is lower than the current permit limitation for Total Petroleum Hydrocarbons.

c. Data submitted with the permit renewal application on all applicable pollutants addressed by the water quality standards (see **Attachment D**) were reviewed. All pollutants that were reported as less than the test quantification level (QL) at QLs consistent with DEQ requirements are considered to be absent for the purpose of this evaluation.

The following pollutants were detected in the discharge in concentrations high enough that limitations were determined to be required: Copper, zinc, cadmium, and lead. Pollutants that were detected but were determined not to require limitations are Ammonia and Chlorides See **Attachment E** for MSTRANTI and STATS v2.0.4 printouts.

d. Laboratory test results submitted between January 2003 and December 2007 for Cadmium, Copper, and Zinc were not used to develop a permit limit or make an existing one more stringent because the data represent concentrations of these metals in total recoverable form rather than dissolved form. Therefore, only data submitted for these metals in Attachment A were used in the limitation development process. New permit limitations were calculated for Cadmium, Copper, and Zinc, but each was slightly less stringent than the existing limitation, which, due to antibacksliding regulations, cannot replace the current permit limitations for these parameters. The permittee has demonstrated that the current limitations can be met. As a result, the limitations determined during the 2003 permit reissuance for Cadmium, Copper, and Zinc shall be carried forward to the 2008 permit reissuance.

e. Copper, Cadmium, Zinc and Lead also have Human Health WLA's which are divided into concentrations that are protective of receiving waters flowing to Public Water Supplies, and of receiving waters that do not flow to Public Water Supplies. Due to the fact that the receiving stream for this facility does not flow to a Public Water Supply, only the latter applies to these parameters. Please see chart below:

Parameter	2008 Permit Reissuance Limitation	Reported Concentrations	Human Health Wasteload Allocation	
			Public Water Supply	All Other Surface Waters
Copper	3.9 µg/L	6.0 µg/L	5 µg/L	None
Cadmium	0.46 µg/L	1.8 µg/L	1,300 µg/L	None
Zinc	30 µg/L	102 µg/L	9,100 µg/L	69,000 µg/L
Lead	4.2 µg/L	19 µg/L 16 µg/L	15 µg/L	None

The permit limitations for these parameters for the 2008 permit reissuance will be protective of the human health criteria.

f. Effluent data results for dissolved silver were reported as less than the QL calculated by the permittee's laboratory (<0.15 µg/L). While the laboratory QL was higher than the Target Value required by DEQ in the Attachment A form included with the 2003 permit (0.1 µg/L), it was found to be less than the Target Value re-calculated in 2008 using updated MSTRANTI input data (0.18 µg/L). The 2008 Target Value will be used for this permit reissuance, resulting in the laboratory QL being considered acceptable. Based on the laboratory results, dissolved silver is believed absent and no further evaluation is considered necessary.

g. The WET limit became a final effluent limitation on February 4, 2006 and shall be carried forward to the 2008 permit reissuance. A total of six WET tests were conducted between December 2004 and March 2008. These results were compiled and compared with the current permit limitation (See **Attachment D** for data summary chart). The 2003 permit required that the permittee meet the acute limitation of NOAEC=100% (TUa=1.0) for both species *P.promelas* and *C.dubia* using 48-Hour Static Tests. The permittee has consistently complied with their acute WET limitation. Due to the fact that this specific limitation cannot become any more stringent, and no data exist to indicate that a different species or test should be used, there is no cause for conducting an analysis to determine if any WET limit changes are necessary for the 2008 permit reissuance. Please see **Attachment F** for WET limitation correspondence.

➢ **Best Professional Judgment (Technology-Based Limitations):** These limitations are derived either from current agency guidance or from staff's best professional judgment.

h. The limitation for Total Petroleum Hydrocarbons (TPH) is carried forth from the 2003 permit reissuance to the 2008 permit reissuance with a change from 30 mg/L to 15 mg/L in accordance with current agency guidance (permit manual).

i. The limitation for Total Organic Carbon (TOC) is carried over from the 2003 permit reissuance to the 2008 permit reissuance because the permittee has previously demonstrated compliance with this limit and therefore it cannot be removed due to antibacksliding policies.

17. **Antibacksliding Statement** : All limits are at least as stringent as the previous permit.

18. **Special Conditions**:

B1. Notification Levels
Rationale: Required by VPDES Permit Regulation, 9 VAC 25-31-200 A for all manufacturing, commercial, mining, and silvicultural dischargers.

B2. Operations & Maintenance Manual
Rationale: Required by Code of Virginia § 62.1-44.16; VPDES Permit Regulation, 9 VAC 25-31-190 E, and 40 CFR 122.41(e). These require proper operation and maintenance of the permitted facility. Compliance with an approved O&M manual ensures this.

B3. Materials Handling & Storage
Rationale: 9 VAC 25-31-50 A prohibits the discharge of any wastes into State waters unless authorized by permit. Code of Virginia § 62.1-44.16 and 62.1-44.17 authorizes the Board to regulate the discharge of industrial waste or other waste.

B4. Compliance Reporting
Rationale: Authorized by VPDES Permit Regulation, 9 VAC 25-31-190 J 4 and 220 I. This condition is necessary when pollutants are monitored by the permittee and a maximum level of quantification and/or a specific analytical method is required in order to assess compliance with a permit limit or to compare effluent quality with a numeric criterion. The quantification levels (QL's) for all metals (in this case, Zinc, Copper, Cadmium, and Lead) are normally calculated as the lesser of 0.4 times the current calculated acute waste load allocation or 0.6 times the current calculated chronic waste load allocation of each pollutant. This process has been carried out for the Lead QL contained in this permit. However, the QL's for Zinc and Copper were calculated as stated above from the WLA's calculated during the 2003 permit reissuance evaluations because the limitations for these parameters are being carried forward from the 2003 permit reissuance to the 2008 permit reissuance. The QL for Cadmium has been set as the lowest possible QL accepted by DEQ (0.30 µg/L) because the QL as calculated above is less than this number. The QL's for TOC and TPH were taken from the 2003 permit and best professional judgment. The QL for Total Xylenes in the hydrostatic testing portion (Part I.B.5.) of the permit is based on guidance from OWPP. The condition also establishes protocols for calculation of reported values. Significant digits guidance was added in accordance with GM06-2016.

B5. Hydrostatic Testing
Rationale: Required by 9 VAC 25-120-10 et seq. using the guidance from the VPDES general permit for discharges from Petroleum Contaminated Site to determine the basis for effluent limits and monitoring requirements. TOC monitoring requirements and pH limitations were not included in the hydrostatic testing requirements as they are limited at Outfall 001. Conditional monitoring and effluent limitations for the remaining parameters were included as this facility is a terminal for hire and the contents of the tanks may vary.

B6. Oil Storage Ground Water Monitoring Reopener
Rationale: Facilities with greater than 1,000,000 gallons of regulated aboveground petroleum storage are required to monitor ground water under the Facility and Aboveground Storage Tank Regulation (9 VAC 25-91-10 et seq.). Where potential exists for ground water pollution and that regulation does not require monitoring, the VPDES permit may contain groundwater monitoring under Code of Virginia § 62.1-44.21.

B7. Whole Effluent Toxicity (WET) Limitation and Monitoring Requirements
Rationale: VPDES Permit Regulation, 9 VAC 25-31-210 and 220 I, requires monitoring in the permit to provide for and assure compliance with all applicable requirements of the State Water Control Law and the Clean Water Act.

B8. Total Maximum Daily Load (TMDL) Reopener
Rationale: Section 303(d) of the Clean Water Act requires that Total Maximum Daily Loads (TMDLs) be developed for streams listed as impaired. This special condition is to allow the permit to be reopened if necessary to bring it into compliance with any applicable TMDL approved for the receiving stream. The re-opener recognizes that, according to Section 402(o)(1) of the Clean Water Act, limits and/or conditions may be either more or less stringent than those contained in this permit. Specifically, they can be relaxed it they are the result of a TMDL, basin plan, or other wasteload allocation prepared under section 303 of the Act. This reopener is included in all permits.

B9. Schedule of Compliance
Rationale: The VPDES Permit Regulation at 9 VAC 25-31-250 allows for schedules that will lead to compliance with the Clean Water Act, the State Water Control Law, and regulations promulgated under them.

B10. Water Quality Monitoring
Rationale: State Water Control Law § 62.1-44.21 authorizes the Board to request information needed to determine the discharge's impact on State waters. To ensure that water quality standards are maintained, the permittee is required to analyze the facility's effluent for the substances noted. It was indicated during drafting of the 2008 permit reissuance that the water quality monitoring form (Attachment A) testing included with the application did not contain test results for the requested parameters. Due to the fact that the permittee was not notified that these additional parameters were required to be submitted with the application for reissuance, a special condition has been placed into this permit requiring that the permittee submit these parameter test results within 1 year of the permit's effective date.

B11. Water Quality Criteria Reopener
Rationale: VPDES Permit Regulation, 9 VAC 25-31-220 D requires effluent limitations to be established which will contribute to the attainment or maintenance of the water quality standards.

Part II, Conditions Applicable to All Permits
Rationale: VPDES Permit Regulation, 9 VAC 25-31-190 requires all VPDES permits to contain or specifically cite the conditions listed.

19. **NPDES Permit Rating Work Sheet**: Total Score: 55 (**See Attachment F**)

20. **Changes to Permit:**

a. The facility's official name has changed from IMTT-Richmond West to IMTT-Virginia West as of January 01, 2008 and is reflected in the permit cover page accordingly. See **Attachment F** for correspondence between DEQ-PRO and the permittee.

b. Changes to Cover page: The changes below regarding river basin identifications are a result of the revised Water Quality Standards effective January 2006.
River Basin – Middle James to Lower James
Section – 7 to 1a
NEW-18 special standard removed

TABLE 3 – Changes to Permit

Parameter Changed	Effluent Limits Changed		Monitoring Requirement Changed		Reason for Change	Date
	From	To	From	To		
Total Recoverable Lead	--	4.2 µg/L	--	1/ 6 Months	A limitation was determined to be required for this parameter. See Item 16 of this fact sheet for more information pertaining to limitation development procedures	3/08
TOC	110.0 mg/L	110 mg/L	1/Month	No Change	Concentration Limitations have been changed in accordance with GM 06-2016 addressing significant digits.	3/08
TPH	30 mg/L	15 mg/L	1/Month	No Change	The limitation for TPH has been changed in accordance with current agency guidance.	1/08

Parameter Changed	Effluent Limits Changed		Monitoring Requirement Changed		Reason for Change	Date
	From	To	From	To		
Hardness	--	NL	--	1/ Year	This parameter has been added in order that metals parameters may be more accurately evaluated during future permit reissuances.	5/08

TABLE 3– Changes to Permit (cont.)

Permit Special Conditions		
From	To	Rationale
Part I.A.2	Deleted	Compliance Reporting – This footnote is not required
--	Part I.A.1(a)	Significant Digits – New, reflects current agency guidance (GM06-2016)
--	Part I.A.1.(b)	TPH Analysis Requirements – New, reflects TPH analysis procedures as required by 9 VAC 25-120
--	Part I.A.1.(c)	Reporting Schedule for Semiannually Reported Effluent Limitations – This footnote has been added in order to clarify the time increments in which the permittee must report test results for the subject limitations.
Part I.A.7	Part I.A.1.(d)	Compliance Schedule – The compliance schedule has been moved to Part I.B.9
--	Part I.A.2.	Sampling Location – New, reflects current agency guidance
Part I.A.3	Part I.A.3.	WET Limitations and Monitoring Requirements – No Change
Part I.A.4.	Part I.A.4.	Hydrostatic Test Waters – No Change
Part I.A.5.	Part I.A.5.	No Discharge of Floating Solids or Visible Foam – No Change
Part I.A.6.	Part I.A.6.	No Discharge of Tank Bottom Waters – No Change
Part I.B.1.	Part I.B.1.	Notification Levels – No Change.
Part I.B.2.	Part I.B.2.	Operations & Maintenance Manual – Language and 90-day submittal requirement added to reflect current agency guidance.
Part I.B.3.	Part I.B.3.	Materials Handling & Storage – No Change
Part I.B.4.	Part I.B.4.	Compliance Reporting Under Part I.A.– Language changed for clarity and in accordance with agency guidance. New maximum QL added for Lead. Reporting instructions pertaining to significant digits added in accordance with GM06-2016.
Part I.B.6.	Part I.B.5.	Hydrostatic Testing – Language revised for acuity purposes. Parameter testing procedures added to reflect current agency guidance. TRC, TOC, TSS, and pH limitations added in accordance with agency guidance. The Dissolved Lead limitation has been changed to Total Recoverable Lead in accordance with DEQ requirements for metals testing.

Part I.B.7.	Part I.B.6.	Oil Storage Groundwater Monitoring Reopener – Language revised to reflect current agency guidance.
Part I.B.8.	Part I.B.7.	Whole Effluent Toxicity (WET) Limitation and Monitoring Requirements – Language modified to reflect removal of a compliance schedule, as the WET limitation became final on February 4, 2006.
Part I.B.9.	--	Water Quality Criteria Monitoring – Removed in accordance with current agency guidance
--	Part I.B.8.	TMDL Reopener – New, added to reflect current agency guidance
Part I.B.5.	Part I.B.9.	Compliance Schedule – This special condition has been changed to reflect a new permit limitation for Total Recoverable Lead.
--	Part I.B.10.	Water Quality Monitoring – See Item 18 (B.10.) of this fact sheet for additional information.
--	Part I.B.11.	Water Quality Criteria Reopener – New, required when Water Quality Monitoring is included in the permit.
Part I.B.10.	--	Nutrient Enriched Waters Reopener – Removed, the NEW-18 designation previously assigned to the permittee's receiving stream was repealed in the current version of the Water Quality Standards.

21. **Variances/Alternate Limits or Conditions**: None

22. **Public Notice Information required by 9 VAC 25-31-280 B**:

All pertinent information is on file and may be inspected, and copied by contacting Jeremy Kazio at:

Virginia DEQ Piedmont Regional Office
4949-A Cox Road
Glen Allen, VA 23060
Telephone No. (804) 527-5044
jskazio@deq.virginia.gov

Persons may comment in writing or by email to the DEQ on the proposed permit action, and may request a public hearing, during the comment period. Comments shall include the name, address, and telephone number of the writer, and shall contain a complete, concise statement of the factual basis for comments. Only those comments received within this period will be considered. The DEQ may decide to hold a public hearing if public response is significant. Requests for public hearings shall state the reason why a hearing is requested, the nature of the issues proposed to be raised in the public hearing and a brief explanation of how the requester's interests would be directly and adversely affected by the proposed permit action. Following the comment period, the Board will make a determination regarding the proposed permit action. This determination will become effective, unless the DEQ grants a public hearing. Due notice of any public hearing will be given.

23. **Additional Comments**:

Previous Board Action: None

Staff Comments:

- Monitoring Frequencies: A reduction in monitoring frequency was not considered for this permit reissuance due to the intermittent nature of the permittee's discharge (Average discharge of 3-4 times per year). The monitoring frequency of 1/ 6 months for Copper, Cadmium, and Zinc in the 2003 permit reissuance (when these limitations were introduced) was based on Best Professional Judgment. This monitoring frequency is being carried forth into the 2008 permit reissuance applying to the same parameters, as well as the new limitation for Lead. A schedule for submission of the test results pertaining to the aforementioned parameters is being included on the Part I.A. page of the 2008 permit reissuance.

- Although this facility's SIC Code (4226) is included under Sector P of the sector-specific stormwater prevention plan categories, vehicle and equipment maintenance shops (vehicle and equipment rehabilitation, mechanical repairs, painting, fueling and lubrication) and/or equipment cleaning operations *do not* exist on site. Therefore, stormwater regulations do not apply to this facility.

- During the 2008 permit reissuance, the permittee requested that this facility be modified to reflect a legal name change. The permittee notified staff by telephone in late November 2007 that a name change would be needed, and staff responded by requesting that the permittee submit a letter to that effect. Approximately 2 weeks later the permittee submitted this letter with a notification that the name change should occur before January 1, 2008. Staff responded with a letter dated January 2, 2008. Please see **Attachment F** for correspondence between the permittee and DEQ clarifying this name change.

- A compliance schedule for the new permit limitation for TPH was not given as it is believed by staff that the permittee will be able to comply with the new limitation at permit reissuance based on past DMR data.

- This permit is being reissued late due to delayed and incomplete application submission.

- A key factor in determining the monitoring requirements for hydrostatic testing waters for this facility is that the SIC code included in the application indicated that this facility temporarily stores petroleum-based products on a "for hire" basis. It is assumed that this designation means that there may be a wide variety of petroleum-based substances stored at this facility, and that the permittee may need to conduct hydrostatic testing on pipelines or tanks that may have been used to transport or store these substances. Therefore, using DEQ's general permit for Petroleum Contaminated Sites (VAG83) as a guide, the monitoring requirements for hydrostatic testing has been expanded to include a wider range of substances in order to account for any potential contaminants associated with this facility's storage capabilities.

24. **Public Comment**: No comments were received. However, subsequent to the public comment period, several changes were made to the permit which are listed below. The facility contact (David Ryan, Project Manager/CSM/FSO) was notified of these changes by telephone at 7:53 a.m. on August 12, 2008, and he stated that he did not have any opposition to these changes to the permit.
    a) Part I.B.5 – Hydrostatic Testing: The Total Xylenes and Naphthalene limitations effective upon discharge of hydrostatic testing waters were changed from 82 µg/L and 63 µg/L to 33 µg/L and 10 µg/L respectively in order to reflect updates made to the 2008 reissuance of the general permit for Petroleum Contaminated Sites (VAG83).

b) Part I.B.5 – Hydrostatic Testing: The QL for Naphthalene was removed.

c) Part I.B.5. – Hydrostatic Testing: A footnote concerning the conditions for testing for Ethanol was added in order to reflect updates made to the 2008 reissuance of the general permit for Petroleum Contaminated Sites (VAG83).

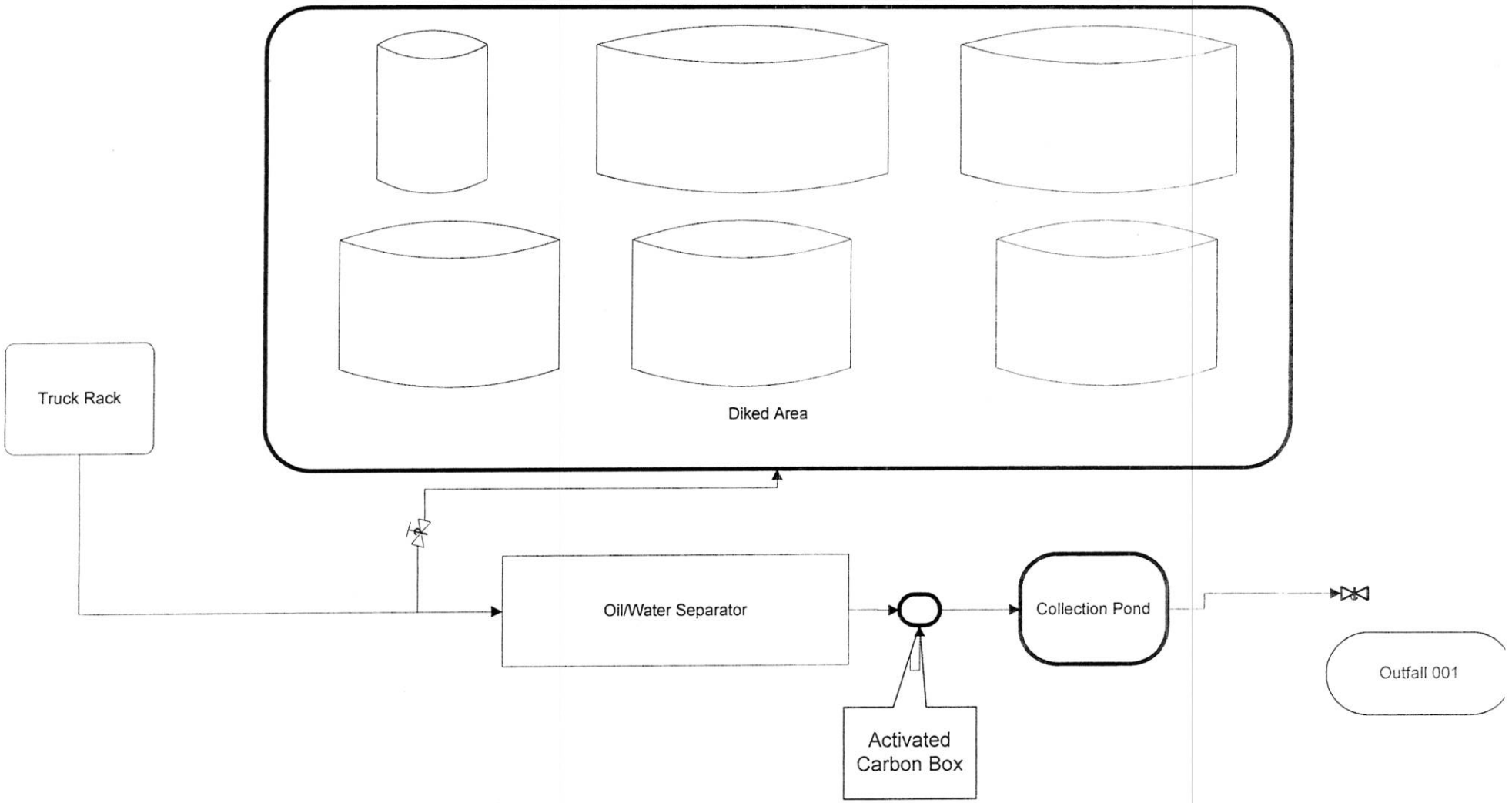
25. **303(d) Listed Segments (TMDL)**: This facility does not discharge to a stream segment listed in the current 303(d) list. Please see the Flow Frequency and 303(d) Status Determination memorandum in **Attachment B**

26. **Fact Sheet Attachment Guide**:

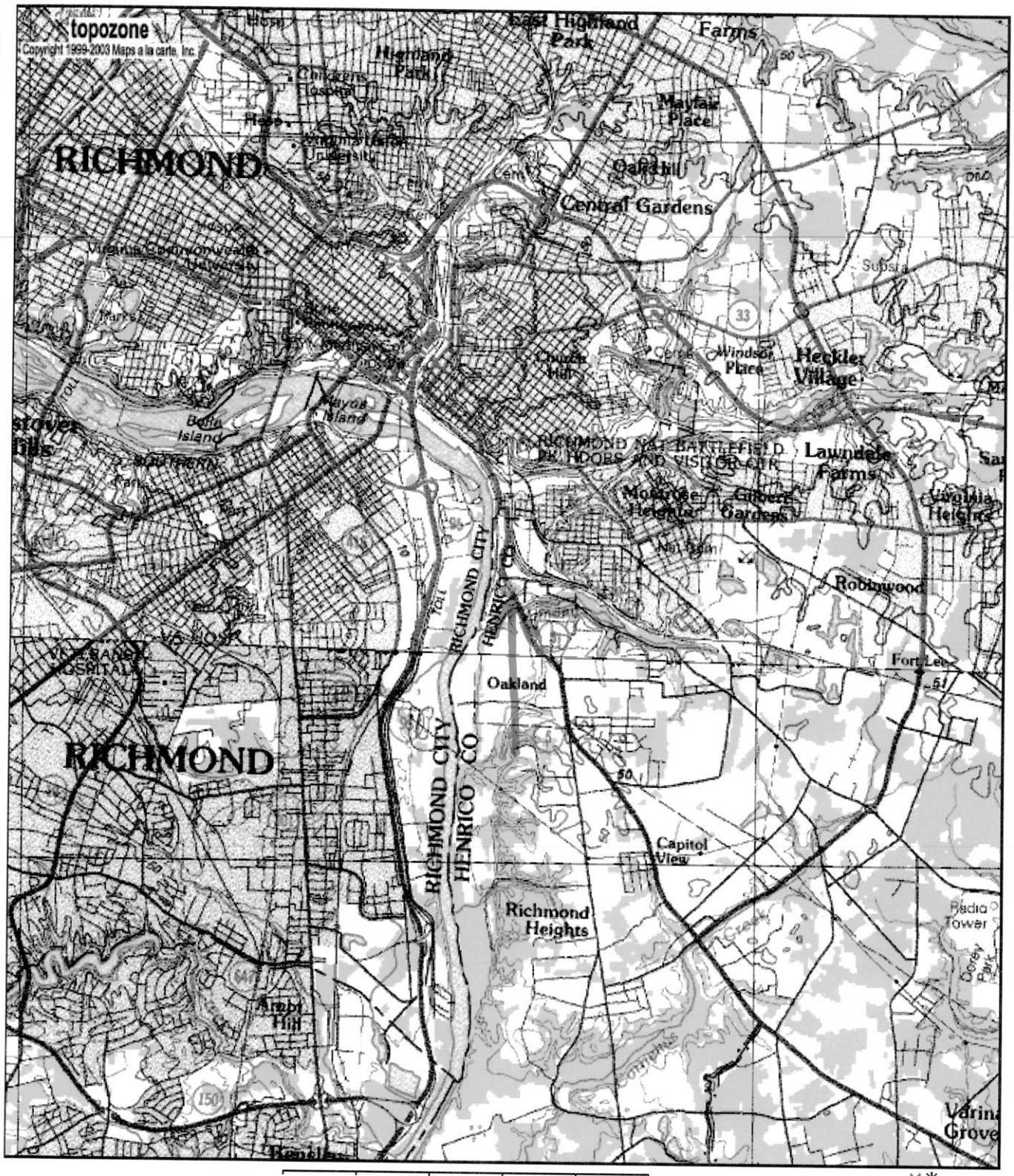
Attachment A	Facility Diagram, Topo Map, & Aerial Photo
Attachment B	Flow Frequency Determination
Attachment C	Site Inspection Report
Attachment D	Effluent Testing Results, DMR Data, WET Testing Results
Attachment E	Effluent Limitation Analysis & MSTRANTI Data Source Sheet
Attachment F	Name Change Correspondence, NPDES Permit Rating Worksheet, WET Limit Correspondence

Attachment A

Facility Diagram, Topo Map, Aerial Photo



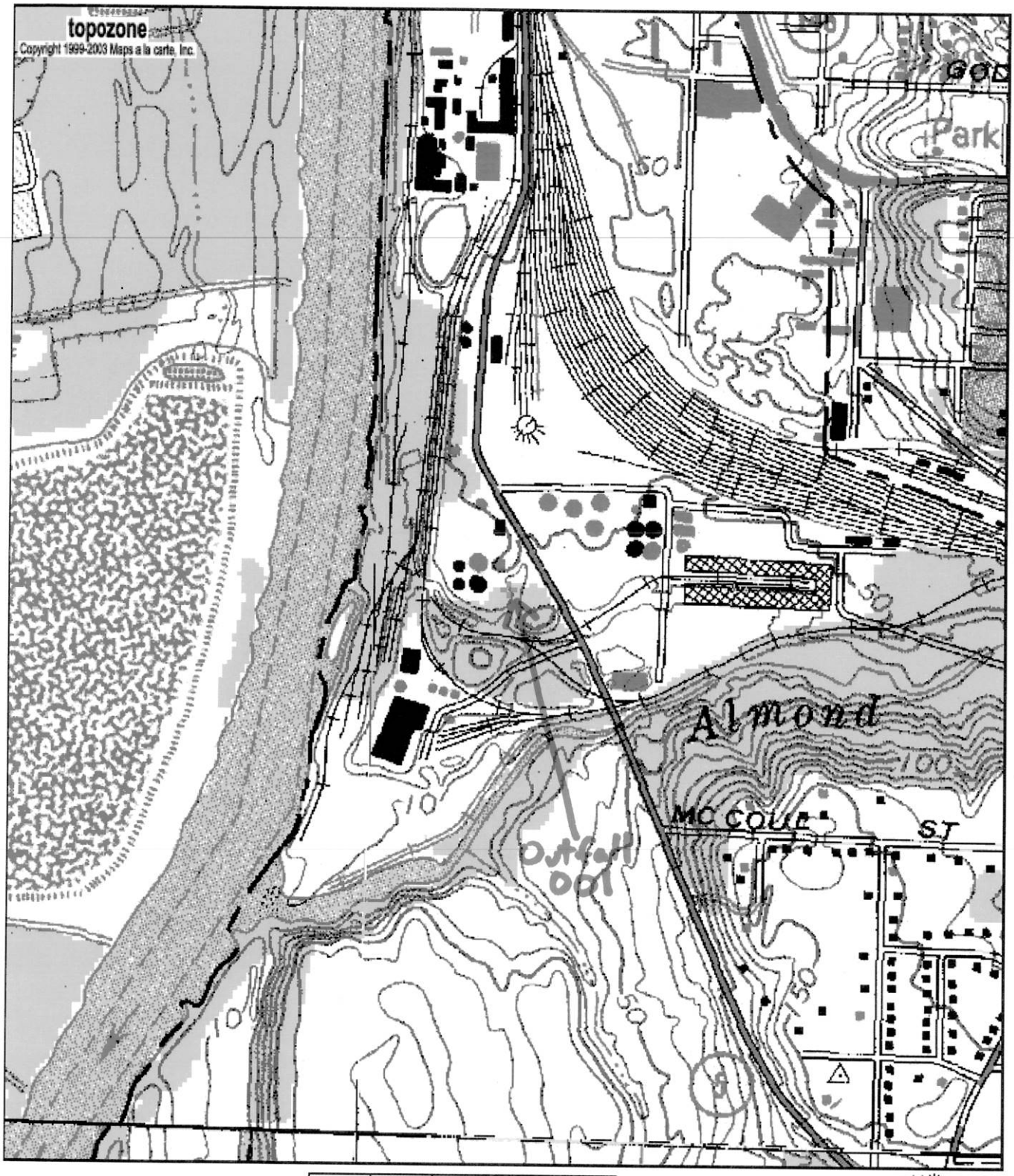
Line Drawing of Facility Showing Water Flow Through the IMTT-Virginia West Facility



37° 30' 30"N, 77° 24' 50"W (NAD83/WGS84)

USGS Richmond (VA) Quadrangle

Projection is UTM Zone 18 NAD83 Datum



37° 30' 30"N, 77° 24' 50"W (NAD83/WGS84)

USGS Richmond (VA) Quadrangle

Projection is UTM Zone 18 NAD83 Datum

ArcIMS HTML Viewer Map

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

Legend

Legend
High Res South
High Res North
TOPO 24k

Outfall
001

Attachment B

Flow Frequency Determination

MEMORANDUM

DEPARTMENT OF ENVIRONMENTAL QUALITY
Piedmont Regional Office
4949-A Cox Road Glen Allen, Virginia 23060

SUBJECT: Flow Frequency Determination / 303(d) Status
IMTT Virginia West – VA0055409

TO: Jeremy Kazio

FROM: Jennifer V. Palmore, P.G.

DATE: January 23, 2008

COPIES: File

The IMTT Virginia-West facility discharges stormwater to an unnamed tributary of the James River in Henrico County near Montrose Heights. The rivermile for the discharge is 5AXAQ000.15. Flow frequencies have been requested at this site for use in developing effluent limitations for the VPDES permit.

At the discharge point, the receiving stream is shown as a dry ditch on the USGS Richmond Quadrangle. The flow frequencies for dry ditches and intermittent streams are listed below:

UT to James River:

1Q30 = 0.00 cfs	High Flow 1Q10 = 0.00 cfs
1Q10 = 0.00 cfs	High Flow 7Q10 = 0.00cfs
7Q10 = 0.00 cfs	High Flow 30Q10 = 0.00 cfs
30Q10 = 0.00 cfs	HM = 0.00 cfs
30Q5 = 0.00 cfs	

Due to its ephemeral nature, the receiving stream is considered a Tier 1 water.

The unnamed tributary is included under the Virginia Department of Health Fish Consumption Advisory for the James River and its tributaries due to kepone in fish tissue. Therefore the tributary was assessed as fully supporting with observed effects for the Fish Consumption Use during the 2006 305(b)/303(d) cycle. The other designated uses were not assessed.

If you have any questions concerning this analysis, please let me know.

MEMORANDUM

DEPARTMENT OF ENVIRONMENTAL QUALITY
Piedmont Regional Office

4949-A Cox Rd Glen Allen, VA 23060 (804) 527-5044

SUBJECT: Site Visit

TO: File

FROM: Jeremy Kazio, PRO

DATE: 26 February 2008
COPIES: File

Facility Name: IMTT-Virginia West Permit Number: VA0055409

On December 17, 2007 I made a short site visit to IMTT-Virginia West. I was not able to meet with the facility contact (Mike Spence) due to schedule conflicts, but the onsite manager was able to quickly show me around the grounds. The facility consists of a large bermed area in which vertical above-ground petroleum storage tanks are set. At the time of my site visit, the bermed area was free of vegetation and any voids that could be caused by local fauna. The floor of the bermed vicinity had a thin layer of mud, with about an inch of water pooling in a few localized areas within the berm, which seemed typical of any outside area during this time of year. These pools of water did not have a sheen to them. Wooden planks were set down to enable the employees to access certain areas without walking through the mud. The drain within the berm that was piped to the oil/water separator was free of debris that would hinder proper drainage. The oil/water separator was covered with a metal lid, and seemed to be in working order, although there was no discharge at the time of my site visit. There was a thick layer of oil and other petroleum based products within the separator. The activated carbon box and sedimentation pond were also in good working order.

The onsite manager was not able show me around for very long due to his schedule, but I was able to observe that, overall, this facility was well kept and in order.

Attachment D

Effluent Testing Data, DMR Data, WET Testing Results

DMR Data - IMTT Virginia West (January 2003 - December 2007)

Rainfall amounts according to NOAA (inches)		DMR Due Date	Permit Limit Parameters							WET Test (NOAEC %)	
			Flow (MGD)	pH (SU)	TOC (mg/L)	TPH (mg/L)	Cadmium (µg/L)	Copper (µg/L)	Zinc (µg/L)	C.dubia	P.promelas
XX	XX	10-Jan-2003									
Jan-03	2.18	10-Feb-2003									
Feb-03	4.21	10-Mar-2003									
Mar-03	5.92	10-Apr-2003	0.004	6.53	5.3	<5.0					
Apr-03	4.38	10-May-2003									
May-03	8.59	10-Jun-2003									
Jun-03	3.87	10-Jul-2003	0.005	6.31	5.8	5.9	0.4	3.7	26		
Jul-03	9.26	10-Aug-2003									
Aug-03	4.66	10-Sep-2003	0.004	6.74	15	<5.0	3.2	5	93		
Sep-03	10.1	10-Oct-2003									
Oct-03	2.43	10-Nov-2003									
Nov-03	3.39	10-Dec-2003									
Dec-03	4.28	10-Jan-2004	0.004	6.2	2	<5.0	<0.3	3.4	57		
Jan-04	1.55	10-Feb-2004									
Feb-04	1.87	10-Mar-2004									
Mar-04	2.08	10-Apr-2004									
Apr-04	3.42	10-May-2004									
May-04	3.06	10-Jun-2004									
Jun-04	9.93	10-Jul-2004	0.0178	7.16	7.5	<5.0					
Jul-04	6.44	10-Aug-2004									
Aug-04	16.3	10-Sep-2004	0.004	5.73	2.4	<5.0					
Sep-04	6.14	10-Oct-2004									
Oct-04	1.95	10-Nov-2004									
Nov-04	3.27	10-Dec-2004									
Dec-04	2.37	10-Jan-2005	0.005	7.84	5.6	<1.0				100	100
Jan-05	3.42	10-Feb-2005									
Feb-05	1.87	10-Mar-2005									
Mar-05	3.99	10-Apr-2005									
Apr-05	2.05	10-May-2005									
May-05	4.22	10-Jun-2005	0.005	7.85	4.8	<5.0				100	100
Jun-05	1.19	10-Jul-2005	0.005	6.8	12	<QL (not specified)					
Jul-05	9.28	10-Aug-2005									
Aug-05	2.56	10-Sep-2005									
Sep-05	0.08	10-Oct-2005									
Oct-05	3.74	10-Nov-2005									
Nov-05	3.81	10-Dec-2005									
Dec-05	5.81	10-Jan-2006	0.178	6.7	3.4	<1.0				100	100
Jan-06	2.89	10-Feb-2006									
Feb-06	1.47	10-Mar-2006									
Mar-06	0.3	10-Apr-2006									
Apr-06	2.53	10-May-2006									
May-06	3.63	10-Jun-2006									
Jun-06	4.9	10-Jul-2006								100	100
Jul-06	4.22	10-Aug-2006									
Aug-06	3.08	10-Sep-2006	0.005	6.7	5.2	<5.0	XX	XX	XX	XX	XX
Sep-06	9.72	10-Oct-2006									
Oct-06	No Data	10-Nov-2006	0.004	6.7	<1.0	<5.0	XX	XX	XX	XX	XX
Nov-06	No Data	10-Dec-2006	0.004	4.5	2.5	<QL (not specified)	XX	XX	XX	100	100
Dec-06	1.42	10-Jan-2007									
Jan-07	3.46	10-Feb-2007									
Feb-07	2.06	10-Mar-2007									
Mar-07	2.66	10-Apr-2007									
Apr-07	3.62	10-May-2007	0.004	6.02	9.3	<QL (not specified)	XX	XX	XX	XX	XX
May-07	3.69	10-Jun-2007									
Jun-07	5.22	10-Jul-2007									
Jul-07	1.69	10-Aug-2007	0.004	6.9	5.4	1.1				XX	XX
Aug-07	0.21	10-Sep-2007									
Sep-07	1.11	10-Oct-2007									
Oct-07	3.54	10-Nov-2007									
Nov-07	0.8	10-Dec-2007									
		90%tile		7.568							
		10%tile		5.846							

Hydrostatic Test Reported with **November 10, 2006** DMR

	Hydrostatic Testing Limit Parameters										
	Cadmium (µg/L)	Copper (µg/L)	Zinc (µg/L)	TPH (mg/L)	Benzene	Toluene	Ethylbenzene	Xylene	pH	Naphthalene	Lead
First Flush	<0.5	<5.0	40	<5.0	<1 µg/L	<1 µg/L	<1 µg/L	<6 µg/L	6.7	XX	XX
Outfall 001	<0.5	<5.0	28	<5.0	<1 µg/L	<1 µg/L	<1 µg/L	<6 µg/L	7.2	XX	XX

Hydrostatic Test Reported with **July 10, 2007** DMR

	Hydrostatic Testing Limit Parameters										
	Cadmium (µg/L)	Copper (µg/L)	Zinc (µg/L)	TPH (mg/L)	Benzene	Toluene	Ethylbenzene	Xylene	pH	Naphthalene	Lead
First Flush	XX	XX	XX	<0.5	<1 µg/L	<1 µg/L	<1 µg/L	<6 µg/L	XX	<6 µg/L	XX
Second Sampling	XX	XX	XX	<0.5	<1 µg/L	<1 µg/L	<1 µg/L	<6 µg/L	XX	<6 µg/L	XX

- No Discharge
- Not required to report this parameter until compliance period is over on February 4, 2006 (first DMR due August 10, 2006)
- No DMR in file
- Hydrostatic Discharge reported
- Parameters should have been reported but weren't
- XX - Not Reported

WET Data - IMTT Virginia West (December 2003 - March 2008)

		Ceriodaphnia Dubia						*Pimphales Promelas*						
	Date of Test	NOAEC (%)	TUa	LC50 (%)	Survival of Test Organisms (%)		In Compliance ?	NOAEC (%)	TUa	LC50 (%)	Survival of Test Organisms (%)		In Compliance ?	Laboratory Used by Permitee
					Control Group	100% Effluent					Control Group	100% Effluent		
	12/30/2004	100	1.00	>100	100	100	YES	100	1.00	>100	100	100	YES	Coastal Bioanalysts
	5/20/2005	100					YES	100					YES	Coastal Bioanalysts
	12/12/2005	100					YES	100					YES	Coastal Bioanalysts
WET Limit Effective - February 4, 2006	6/30/2006	100					YES	100					YES	Coastal Bioanalysts
	11/29/2006	100	1.00	>100	100	95	YES	100	1.00	>100	100	100	YES	Coastal Bioanalysts
	5/29/2007 ?	NO DATA SUBMITTED												
	11/29/2007 ?													
	2/14/2008	100	1.00	>100	100	95	YES	100	1.00	>100	100	100	YES	Coastal Bioanalysts

	- There are no data in DEQ's files. This information was obtained in a written document from the permittee's laboratory on January 2, 2008.

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Certificate of Analysis

Final Report

Laboratory Order ID 08020188

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: February 14, 2008
Date Issued: February 25, 2008

Submitted To: Mike Spence

Project Number: NA

Client Site I.D.: Richmond West

Purchase Order NA

Sample I.D.: Outfall 001 W

Laboratory Sample I.D.: 08020188-001

Date/Time Sampled: 02/14/08 10:27

Parameter	Method	Sample Results	Rep Limi	Analysis Date/Time	Analyst
Chromium, Hexavalent	EPA218.4/SM3500 Cr D	< 0.01 mg/L	0.010	02/14/08 17:20	JCW
pH	SM4500-H B	6.7 SU	--	02/14/08 10:28	ETS
Cadmium	EPA200.9	0.0018 mg/L	0.0003	02/19/08 16:10	DMH
Copper	EPA200.9	0.006 mg/L	0.003	02/18/08 11:41	DMH
Lead	EPA200.9	0.016 mg/L	0.002	02/21/08 10:54	DMH
Nickel	EPA200.9	< 0.003 mg/L	0.003	02/21/08 15:36	CGT
Silver	EPA200.9	< 0.0002 mg/L	0.0002	02/21/08 15:07	DMH
Zinc	EPA200.7	0.102 mg/L	0.010	02/20/08 16:05	CGT
TPH-Volatiles (GRO)	SW8015B	< 0.5 mg/L	0.5	02/15/08 17:44	MKD
TPH-Semi-Volatiles (DRO)	SW8015B	5.0 mg/L	0.5	02/15/08 19:16	JHV
Chlorine, Residual	SM4500-Cl G	< 0.1 mg/L	0.1	02/14/08 10:35	ETS
Total Organic Carbon (TOC)	SM5310C	12.9 mg/L	1.0	02/18/08 14:57	JCW
Tributyltin	85-3295	See Attached	0.05		

Ted Soyars

Laboratory Manager

Kazio,Jeremy

From: Emile Shaw [eshaw@awslabs.com]
Sent: Thursday, March 20, 2008 9:23 AM
To: Kazio,Jeremy
Cc: mikespence@imtt.com
Subject: Re-issued certificate for IMTT Richmond AWS Order ID 08020188

Mr. Kazio:
Looking back over the Order ID you called about, I discovered that we did re-issue that certificate of analysis on February 26, 2008 I have attached a PDF copy of the revised COA. The re-issued certificate reflects changes to the Report Limits for Hexavalent Chromium and Silver. I hope this answers the questions you had. If I can be of any further assistance, I will do my best to assist you.

Sincerely,
Emile Shaw
Air Water & Soil Laboratories, Inc.
(804) 358-8295

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Certificate of Analysis

Final Report

Laboratory Order ID 08020188

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: February 14, 2008
Date Issued: February 26, 2008

Submitted To: Mike Spence

Project Number: NA

Client Site I.D.: Richmond West

Purchase Order: NA

Sample I.D.: Outfall 001 W

Laboratory Sample I.D.: 08020188-001

Date/Time Sampled: 02/14/08 10:27

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
Chromium, Hexavalent	EPA218.4/SM3500Cr D	< 0.005 mg/L	0.005	02/14/08 17:20	JCW
pH	SM4500-H B	6.7 SU	--	02/14/08 10:28	ETS
Cadmium	EPA200.9	0.0018 mg/L	0.0003	02/19/08 16:10	DMH
Copper	EPA200.9	0.006 mg/L	0.003	02/18/08 11:41	DMH
Lead	EPA200.9	0.016 mg/L	0.002	02/21/08 10:54	DMH
Nickel	EPA200.9	< 0.003 mg/L	0.003	02/21/08 15:36	CGT
Silver	EPA200.9	< 0.00015 mg/L	0.00015	02/21/08 15:07	DMH
Zinc	EPA200.7	0.102 mg/L	0.010	02/20/08 16:05	CGT
TPH-Volatiles (GRO)	SW8015B	< 0.5 mg/L	0.5	02/15/08 17:44	MKD
TPH-Semi-Volatiles (DRO)	SW8015B	5.0 mg/L	0.5	02/15/08 19:16	JHV
Chlorine, Residual	SM4500-Cl G	< 0.1 mg/L	0.1	02/14/08 10:35	ETS
Total Organic Carbon (TOC)	SM5310C	12.9 mg/L	1.0	02/18/08 14:57	JCW
Tributyltin	85-3295	See Attached	0.05		

Ted Soyars

Laboratory Manager

TELEPHONE: (757) 865-0880
TOLL-FREE: (800) 695-2162
FAX: (757) 865-8014

UNIVERSAL LABORATORIES

20 Research Drive Hampton, Va 23666

REPORT OF ANALYSIS

Order ID: 0802213

(REPORT DATE)
25-Feb-08

TO: Air Water & Soil Laboratories
2109 A North Hamilton Street
Richmond VA 23230
ATTN: Jessica Comstock

Project ID: N/A
Project # N/A
Site: 08020188-001
Matrix: Wastewater

UL Sample Number: 0802213-001
Sample ID: 08020188-001
Grab Date/Time: 2/14/2008 10:27
Composite Start: N/A
Composite Stop: N/A
Collected By: Client

Comments for Order:

Parameter	Method	Test Result	Units	UL Report Limit	Analysis Date/Time	Analyst
TBT Tributyltin	GC/FPD	<	ng/l	30	2/22/2008 13:01:00	JM

Comments for Sample ID 0802213-001
No comments

Respectfully Submitted,

Virginia Drinking Water Lab# 00030
VDEQ Lab #000003

North Carolina Drinking Water Lab # 51706
North Carolina Wastewater/Groundwater Lab # 543

EPA LAB CODE VA00912 0802213-001

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Certificate of Analysis

Final Report

Laboratory Order ID 07120253

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: December 18, 2007
Date Issued: December 27, 2007

Submitted To: Mike Spence
Project Number: NA

Client Site I.D.: Richmond Terminal Monthly
Purchase Order: NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 07120253-001
Date/Time Sampled: 12/18/07 13:25

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
TPH-Volatiles (GRO)	SW8015B	< 0.5 mg/L	0.5	12/21/07 18:19	MKD
TPH-Semi-Volatiles (DRO)	SW8015B	13.1 mg/L	0.5	12/20/07 15:11	JHV
Ammonia	EPA350.1	0.13 mg/L	0.10	12/19/07 13:12	RPF
BOD	SM5210B	10.7 mg/L	2.0	12/26/07 13:50	RPF & LG
COD	EPA410.4	82.1 mg/L	10.0	12/26/07 10:00	VLG
Oil and Grease	EPA1664A	< 10 mg/L	10.0	12/20/07 9:42	RPF
pH	SM4500-H B	7.0 SU	--	12/19/07 17:08	RPF
The pH measurement was performed outside of the 15 minute holding time.					
TSS	SM2540D	7.9 mg/L	1.0	12/21/07 10:25	LG
Total Organic Carbon (TOC)	SM5310C	23.7 mg/L	1.0	12/19/07 14:52	JCW

Sample I.D.: Outfall 002 E
Laboratory Sample I.D.: 07120253-002
Date/Time Sampled: 12/18/07 14:05

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
TPH-Volatiles (GRO)	SW8015B	< 0.5 mg/L	0.5	12/21/07 18:45	MKD
TPH-Semi-Volatiles (DRO)	SW8015B	< 0.5 mg/L	0.5	12/20/07 15:37	JHV
Ammonia	EPA350.1	< 0.1 mg/L	0.10	12/19/07 13:12	RPF
BOD	SM5210B	3.2 mg/L	2.0	12/26/07 13:50	RPF & LG
COD	EPA410.4	16.9 mg/L	10.0	12/26/07 10:00	VLG
Oil and Grease	EPA1664A	< 10 mg/L	10.0	12/20/07 9:42	RPF
pH	SM4500-H B	8.8 SU	--	12/18/07 17:08	RPF
The pH measurement was performed outside of the 15 minute holding time.					
TSS	SM2540D	74.7 mg/L	1.0	12/21/07 10:25	LG
Total Organic Carbon (TOC)	SM5310C	4.5 mg/L	1.0	12/19/07 14:52	JCW

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Certificate of Analysis

Final Report

Laboratory Order ID 07120246

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: December 18, 2007
Date Issued: January 07, 2008

Submitted To: Mike Spence

Project Number: NA

Client Site I.D.: IMTT Richmond West Attachment A

Purchase Order: NA

Sample I.D.: Outfall 001 W

Laboratory Sample I.D.: 07120246-001

Date/Time Sampled: 12/18/07 11:50

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
Chromium, Dissolved Hexavalent	EPA218.4/SM3500Cr D	< 0.01 mg/L	0.010	12/19/07 11:10	JCW
Chromium, Dissolved Trivalent	Calc.	< 0.01 mg/L	0.010	12/19/07 11:10	JCW
Fecal Coliform	SM9221E	110 mpn/100mL	2	12/18/07 14:03	RPF
Antimony, Dissolved	EPA200.9	< 0.005 mg/L	0.005	01/07/08 11:32	DMH
Arsenic, Dissolved	EPA200.7	< 0.01 mg/L	0.010	12/19/07 12:17	CGT
Calcium	EPA200.7	8.09 mg/L	0.050	12/19/07 12:13	CGT
Chromium, Dissolved	EPA200.7	< 0.01 mg/L	0.010	12/19/07 12:17	CGT
Hardness (Calc)	SM2340B	30.2 mg/L	1.0	12/19/07 10:22	CGT
Lead, Dissolved	EPA200.7	0.019 mg/L	0.010	12/19/07 12:17	CGT
Magnesium	EPA200.7	2.43 mg/L	0.010	12/19/07 12:13	CGT
Mercury, Dissolved	EPA245.1	< 0.0002 mg/L	0.0002	12/21/07 10:53	DMH
Nickel, Dissolved	EPA200.7	< 0.01 mg/L	0.010	12/19/07 12:17	CGT
Selenium, Dissolved	EPA200.9	< 0.003 mg/L	0.003	12/26/07 19:52	DMH
Silver, Dissolved	EPA200.7	< 0.01 mg/L	0.010	12/19/07 12:17	CGT
m,p-Xylenes	SW8021B	< 4 ug/L	4.0	12/21/07 17:50	MKD
o-Xylene	SW8021B	< 2 ug/L	2.0	12/21/07 17:50	MKD
Xylenes, Total	SW8021B	< 6 ug/L	6.0	12/21/07 17:50	MKD
Acrolein	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Acrylonitrile	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Chloromethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Vinyl chloride	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Bromomethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Chloroethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Trichlorofluoromethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,1-Dichloroethylene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Methylene chloride	EPA624	< 20 ug/L	20.0	12/20/07 18:38	DMB
trans-1,2-Dichloroethylene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,1-Dichloroethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Chloroform	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,1,1-Trichloroethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Carbon tetrachloride	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB

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Certificate of Analysis

Final Report

Laboratory Order ID 07120246

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: December 18, 2007
Date Issued: January 07, 2008

Submitted To: Mike Spence
Project Number: NA
Client Site I.D.: IMTT Richmond West Attachment A
Purchase Order: NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 07120246-001
Date/Time Sampled: 12/18/07 11:50

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
Benzene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,2-Dichloroethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Trichloroethylene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,2-Dichloropropane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Bromodichloromethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
2-Chloroethyl vinyl ether	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
cis-1,3-Dichloropropene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Toluene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
trans-1,3-Dichloropropene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,1,2-Trichloroethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Tetrachloroethylene (PCE)	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Dibromochloromethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Chlorobenzene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Ethylbenzene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
m,p-Xylenes	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
o-Xylene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Xylenes, Total	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Bromoform	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,1,2,2-Tetrachloroethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,3-Dichlorobenzene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,4-Dichlorobenzene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,2-Dichlorobenzene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Kepone	SW8270C	< 20 ug/L	20.0	12/21/07 20:07	JHV
Mirex	SW8081A	< 0.1 ug/L	0.100	12/27/07 17:02	RMW
PCB as Aroclor 1016	EPA608	< 1 ug/L	1.0	12/27/07 17:02	RMW
PCB as Aroclor 1221	EPA608	< 1 ug/L	1.0	12/27/07 17:02	RMW
PCB as Aroclor 1232	EPA608	< 1 ug/L	1.0	12/27/07 17:02	RMW
PCB as Aroclor 1242	EPA608	< 1 ug/L	1.0	12/27/07 17:02	RMW
PCB as Aroclor 1248	EPA608	< 1 ug/L	1.0	12/27/07 17:02	RMW
PCB as Aroclor 1254	EPA608	< 1 ug/L	1.0	12/27/07 17:02	RMW
PCB as Aroclor 1260	EPA608	< 1 ug/L	1.0	12/27/07 17:02	RMW

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Certificate of Analysis

Final Report

Laboratory Order ID 07120246

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: December 18, 2007
Date Issued: January 07, 2008

Submitted To: Mike Spence

Project Number: NA

Client Site I.D.: IMTT Richmond West Attachment A

Purchase Order: NA

Sample I.D.: Outfall 001 W

Laboratory Sample I.D.: 07120246-001

Date/Time Sampled: 12/18/07 11:50

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
4,4-DDD	EPA608	< 0.1 ug/L	0.100	12/27/07 17:02	RMW
4,4-DDE	EPA608	< 0.04 ug/L	0.040	12/27/07 17:02	RMW
4,4-DDT	EPA608	< 0.01 ug/L	0.010	12/27/07 17:02	RMW
Aldrin	EPA608	< 0.02 ug/L	0.020	12/27/07 17:02	RMW
alpha-BHC	EPA608	< 0.02 ug/L	0.020	12/27/07 17:02	RMW
beta-BHC	EPA608	< 0.05 ug/L	0.050	12/27/07 17:02	RMW
Chlordane	EPA608	< 0.2 ug/L	0.20	12/27/07 17:02	RMW
delta-BHC	EPA608	< 0.05 ug/L	0.050	12/27/07 17:02	RMW
Dieldrin	EPA608	< 0.02 ug/L	0.020	12/27/07 17:02	RMW
Endosulfan I	EPA608	< 0.1 ug/L	0.100	12/27/07 17:02	RMW
Endosulfan II	EPA608	< 0.04 ug/L	0.040	12/27/07 17:02	RMW
Endosulfan sulfate	EPA608	< 0.01 ug/L	0.010	12/27/07 17:02	RMW
Endrin	EPA608	< 0.1 ug/L	0.100	12/27/07 17:02	RMW
Endrin aldehyde	EPA608	< 0.2 ug/L	0.200	12/27/07 17:02	RMW
gamma-BHC (Lindane)	EPA608	< 0.02 ug/L	0.020	12/27/07 17:02	RMW
Heptachlor	EPA608	< 0.05 ug/L	0.050	12/27/07 17:02	RMW
Heptachlor epoxide	EPA608	< 0.2 ug/L	0.200	12/27/07 17:02	RMW
Methoxychlor	EPA608	< 2 ug/L	2.00	12/27/07 17:02	RMW
Toxaphene	EPA608	< 3 ug/L	3.00	12/27/07 17:02	RMW
4-Chloro-3-methylphenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2-Chlorophenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2,4-Dichlorophenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2,4-Dimethylphenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
4,6-Dinitro-2-methylphenol	EPA625	< 50 ug/L	50.0	12/21/07 20:07	JHV
2,4-Dinitrophenol	EPA625	< 50 ug/L	50.0	12/21/07 20:07	JHV
2-Nitrophenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
4-Nitrophenol	EPA625	< 50 ug/L	50.0	12/21/07 20:07	JHV
Pentachlorophenol	EPA625	< 20 ug/L	20.0	12/21/07 20:07	JHV
Phenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2,4,6-Trichlorophenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Acenaphthene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Acenaphthylene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV

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Certificate of Analysis

Final Report

Laboratory Order ID 07120246

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: December 18, 2007
Date Issued: January 07, 2008

Submitted To: Mike Spence

Project Number: NA

Client Site I.D.: IMTT Richmond West Attachment A

Purchase Order: NA

Sample I.D.: Outfall 001 W

Laboratory Sample I.D.: 07120246-001

Date/Time Sampled: 12/18/07 11:50

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
Anthracene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Benzo (a) anthracene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Benzo (b) fluoranthene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Benzo (k) fluoranthene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Benzo (g,h,i) perylene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Benzo (a) pyrene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
4-Bromophenyl phenyl ether	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Butyl benzyl phthalate	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
bis (2-Chloroethoxy) methane	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
bis (2-Chloroethyl) ether	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
bis (2-Chloroisopropyl) ether	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
4-Chlorophenyl phenyl ether	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Chrysene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Dibenz (a,h) anthracene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Di-n-butyl phthalate	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
1,2-Dichlorobenzene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
1,3-Dichlorobenzene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
1,4-Dichlorobenzene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Diethyl phthalate	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Dimethyl phthalate	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2,4-Dinitrotoluene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2,6-Dinitrotoluene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Di-n-octyl phthalate	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
bis (2-Ethylhexyl) phthalate	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Fluoranthene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Fluorene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Hexachlorobenzene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Hexachlorobutadiene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Hexachlorocyclopentadiene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Hexachloroethane	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Indeno (1,2,3-cd) pyrene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Isophorone	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV

AIR WATER SOIL LABORATORIES, INC.
2109A North Hamilton Street • Richmond, Virginia 23230 • Tel: (804) 358-8295 Fax: (804) 358-8297

Certificate of Analysis

Final Report

Laboratory Order ID 07120246

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: December 18, 2007
Date Issued: January 07, 2008

Submitted To: Mike Spence
Project Number: NA

Client Site I.D.: IMTT Richmond West Attachment A
Purchase Order: NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 07120246-001
Date/Time Sampled: 12/18/07 11:50

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
Naphthalene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Nitrobenzene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
N-Nitrosodimethylamine	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
N-Nitrosodiphenylamine	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
N-Nitrosodi-N-propylamine	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Phenanthrene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Pyrene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
1,2,4-Trichlorobenzene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Benzidine	EPA625	< 50 ug/L	50.0	12/21/07 20:07	JHV
3,3-Dichlorobenzidine	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2,3,4,6-Tetrachlorophenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2-Chloronaphthalene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Ammonia	EPA350.1	0.16 mg/L	0.10	12/19/07 13:12	RPF
Chloride	EPA300.0	3.3 mg/L	1.0	12/19/07 4:30	RMW
Cyanide	Kelada-01	< 0.01 mg/L	0.01	12/20/07 10:00	LG
pH	SM4500-H B	6.8 SU	–	12/18/07 14:17	RPF
	The pH measurement was performed outside of the 15 minute holding time.				
Sulfide	SM4500-S2 E	< 1 mg/L	1.0	12/21/07 11:08	VLG
Dichlorvos	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Mevinphos	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Ethoprop	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Phorate	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Naled	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Diazinon	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Disulfoton	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Demeton-s	EPA622	< 0.5 ug/L	0.500	12/27/07 17:30	Sub-TA-FL
Demeton-o	EPA622	< 0.5 ug/L	0.500	12/27/07 17:30	Sub-TA-FL
Ronnel	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Chlorpyrifos	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Fenthion	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Trichloronat	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Fensulfothion	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL

AIR WATER & SOIL LABORATORIES, INC.
2109A North Hamilton Street • Richmond, Virginia 23230 • Tel: (804) 358-8295 Fax: (804) 358-8297

Certificate of Analysis

Final Report

Laboratory Order ID 07120246

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: December 18, 2007
Date Issued: January 07, 2008

Submitted To: Mike Spence
Project Number: NA

Client Site I.D.: IMTT Richmond West Attachment A
Purchase Order: NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 07120246-001

Date/Time Sampled: 12/18/07 11:50

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
Methyl parathion	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Tokuthion	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Merphos	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Stirophos	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Bolstar	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Azinophos, Methyl (Guthion)	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Coumaphos	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Sulfotepp	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Tepp	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Dimethoate	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Malathion	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Ethyl parathion	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
EPN	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL

Ted Soyars
Laboratory Manager

Coastal Bioanalysts, Inc.

FAX MESSAGE

TO: Name: *Jeremy Kazio*

Company: *DEQ*

FAX No.: 804-527-5106

Date: *1-2-08*

No. Pages: 1

FROM: Name: *Pete Di Lisle*

Re: Toxicity test results IMTT Richmond, VA0055409 conducted by Coastal Bioanalysts, Inc.

Sample Date	Species	NOAEC (%)
12/30/04	*Ceriodaphnia dubia* 48-h Acute Test (EPA Method # 2002.0)	100
12/30/04	*Pimephales promelas* 48-h Acute Test (EPA Method # 2000.0)	100
5/20/05	*Ceriodaphnia dubia* 48-h Acute Test (EPA Method # 2002.0)	100
5/20/05	*Pimephales promelas* 48-h Acute Test (EPA Method # 2000.0)	100
12/12/05	*Ceriodaphnia dubia* 48-h Acute Test (EPA Method # 2002.0)	100
12/12/05	*Pimephales promelas* 48-h Acute Test (EPA Method # 2000.0)	100
6/30/06	*Ceriodaphnia dubia* 48-h Acute Test (EPA Method # 2002.0)	100
6/30/06	*Pimephales promelas* 48-h Acute Test (EPA Method # 2000.0)	100
11/29/06	*Ceriodaphnia dubia* 48-h Acute Test (EPA Method # 2002.0)	100
11/29/06	*Pimephales promelas* 48-h Acute Test (EPA Method # 2000.0)	100

6400 Enterprise Court, Gloucester, VA 23061
Phone 804-694-8285 Fax 804-695-1129 cbi@coastalbio.com

Attachment E

Effluent Limitation Analysis & MSTRANTI Data Source Sheet

MSTRANTI DATA SOURCE REPORT

Stream Information	
Mean Hardness	All Stream Information is the same as Effluent Information due to lack of flow in receiving waterbody.
90% Temperature (annual)	
90% Temperature (wet season)	
90% Maximum pH	
10% Maximum pH	
Tier Designation	Flow Frequency Analysis
Stream Flows	
All Data	Flow Frequency Analysis
Mixing Information	
All Data	Dry ditch discharge, 100% mix assumed.
Effluent Information	
Mean Hardness	From effluent data provided by permittee with application.
90% Temperature (annual)	Listed in application as "ambient". The temperature used in MSTRANTI was taken from stormwater data for another facility (Rehrig International) located in the area.
90% Maximum pH	DMR data
10% Maximum pH	DMR data
Discharge Flow	Provided by permittee in application.

FRESHWATER
WATER QUALITY CRITERIA / WASTELOAD ALLOCATION ANALYSIS

Facility Name: IMTT Virginia - West Permit No.: VA0055409

Receiving Stream: UT to the James River (Lower)

Version: OWP Guidance Memo 00-2011 (8/24/00)

Stream Information

Mean Hardness (as CaCO3) =	30.2	mg/L
90% Temperature (Annual) =	25.6	deg C
90% Temperature (Wet season) =	25.6	deg C
90% Maximum pH =	7.6	SU
10% Maximum pH =	5.8	SU
Tier Designation (1 or 2) =	1	
Public Water Supply (PWS) Y/N? =	n	
Trout Present Y/N? =	n	
Early Life Stages Present Y/N? =	y	

Stream Flows

1Q10 (Annual) =	0	MGD
7Q10 (Annual) =	0	MGD
30Q10 (Annual) =	0	MGD
1Q10 (Wet season) =	0	MGD
30Q10 (Wet season)	0	MGD
30Q5 =	0	MGD
Harmonic Mean =	0	MGD
Annual Average =	0	MGD

Mixing Information

Annual - 1Q10 Mix =	100	%
- 7Q10 Mix =	100	%
- 30Q10 Mix =	100	%
Wet Season - 1Q10 Mix =	100	%
- 30Q10 Mix =	100	%

Effluent Information

Mean Hardness (as CaCO3) =	30.2	mg/L
90% Temp (Annual) =	25.6	deg C
90% Temp (Wet season) =	25.6	deg C
90% Maximum pH =	7.6	SU
10% Maximum pH =	5.8	SU
Discharge Flow =	0.005	MGD

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Acenapthene	0	--	--	na	2.7E+03	--	--	na	2.7E+03	--	--	--	--	--	--	--	--	--	--	na	2.7E+03
Acrolein	0	--	--	na	7.8E+02	--	--	na	7.8E+02	--	--	--	--	--	--	--	--	--	--	na	7.8E+02
Acrylonitrile[C]	0	--	--	na	6.6E+00	--	--	na	6.6E+00	--	--	--	--	--	--	--	--	--	--	na	6.6E+00
Aldrin [C]	0	3.0E+00	--	na	1.4E-03	3.0E+00	--	na	1.4E-03	--	--	--	--	--	--	--	--	3.0E+00	--	na	1.4E-03
Ammonia-N (mg/l) (Yearly)	0	1.70E+01	1.95E+00	na	--	1.7E+01	1.9E+00	na	--	--	--	--	--	--	--	--	--	1.7E+01	1.9E+00	na	--
Ammonia-N (mg/l) (High Flow)	0	1.70E+01	1.95E+00	na	--	1.7E+01	1.9E+00	na	--	--	--	--	--	--	--	--	--	1.7E+01	1.9E+00	na	--
Anthracene	0	--	--	na	1.1E+05	--	--	na	1.1E+05	--	--	--	--	--	--	--	--	--	--	na	1.1E+05
Antimony	0	--	--	na	4.3E+03	--	--	na	4.3E+03	--	--	--	--	--	--	--	--	--	--	na	4.3E+03
Arsenic	o	3.4E+02	1.5E+02	na	--	3.4E+02	1.5E+02	na	--	--	--	--	--	--	--	--	--	3.4E+02	1.5E+02	na	--
Barium	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Benzene [C]	0	--	--	na	7.1E+02	--	--	na	7.1E+02	--	--	--	--	--	--	--	--	--	--	na	7.1E+02
Benzidine[C]	0	--	--	na	5.4E-03	--	--	na	5.4E-03	--	--	--	--	--	--	--	--	--	--	na	5.4E-03
Benzo (a) anthracene [C]	0	--	--	na	4.9E-01	--	--	na	4.9E-01	--	--	--	--	--	--	--	--	--	--	na	4.9E-01
Benzo (b) fluoranthene [C]	0	--	--	na	4.9E-01	--	--	na	4.9E-01	--	--	--	--	--	--	--	--	--	--	na	4.9E-01
Benzo (k) fluoranthene [C]	0	--	--	na	4.9E-01	--	--	na	4.9E-01	--	--	--	--	--	--	--	--	--	--	na	4.9E-01
Benzo (a) pyrene [C]	0	--	--	na	4.9E-01	--	--	na	4.9E-01	--	--	--	--	--	--	--	--	--	--	na	4.9E-01
Bis2-Chloroethyl Ether	0	--	--	na	1.4E+01	--	--	na	1.4E+01	--	--	--	--	--	--	--	--	--	--	na	1.4E+01
Bis2-Chloroisopropyl Ether	0	--	--	na	1.7E+05	--	--	na	1.7E+05	--	--	--	--	--	--	--	--	--	--	na	1.7E+05
Bromoform [C]	0	--	--	na	3.6E+03	--	--	na	3.6E+03	--	--	--	--	--	--	--	--	--	--	na	3.6E+03
Butylbenzylphthalate	0	--	--	na	5.2E+03	--	--	na	5.2E+03	--	--	--	--	--	--	--	--	--	--	na	5.2E+03
Cadmium	0	1.0E+00	4.4E-01	na	--	1.0E+00	4.4E-01	na	--	--	--	--	--	--	--	--	--	1.0E+00	4.4E-01	na	--
Carbon Tetrachloride [C]	0	--	--	na	4.4E+01	--	--	na	4.4E+01	--	--	--	--	--	--	--	--	--	--	na	4.4E+01
Chlordane [C]	0	2.4E+00	4.3E-03	na	2.2E-02	2.4E+00	4.3E-03	na	2.2E-02	--	--	--	--	--	--	--	--	2.4E+00	4.3E-03	na	2.2E-02
Chloride	0	8.6E+05	2.3E+05	na	--	8.6E+05	2.3E+05	na	--	--	--	--	--	--	--	--	--	8.6E+05	2.3E+05	na	--
TRC	0	1.9E+01	1.1E+01	na	--	1.9E+01	1.1E+01	na	--	--	--	--	--	--	--	--	--	1.9E+01	1.1E+01	na	--
Chlorobenzene	0	--	--	na	2.1E+04	--	--	na	2.1E+04	--	--	--	--	--	--	--	--	--	--	na	2.1E+04

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Chlorodibromomethane [C]	0	--	--	na	3.4E+02	--	--	na	3.4E+02	--	--	--	--	--	--	--	--	--	--	na	3.4E+02
Chloroform [C]	0	--	--	na	2.9E+04	--	--	na	2.9E+04	--	--	--	--	--	--	--	--	--	--	na	2.9E+04
2-Chloronaphthalene	0	--	--	na	4.3E+03	--	--	na	4.3E+03	--	--	--	--	--	--	--	--	--	--	na	4.3E+03
2-Chlorophenol	0	--	--	na	4.0E+02	--	--	na	4.0E+02	--	--	--	--	--	--	--	--	--	--	na	4.0E+02
Chlorpyrifos	0	8.3E-02	4.1E-02	na	--	8.3E-02	4.1E-02	na	--	--	--	--	--	--	--	--	--	8.3E-02	4.1E-02	na	--
Chromium III	0	2.1E+02	2.8E+01	na	--	2.1E+02	2.8E+01	na	--	--	--	--	--	--	--	--	--	2.1E+02	2.8E+01	na	--
Chromium VI	0	1.6E+01	1.1E+01	na	--	1.6E+01	1.1E+01	na	--	--	--	--	--	--	--	--	--	1.6E+01	1.1E+01	na	--
Chromium, Total	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Chrysene [C]	0	--	--	na	4.9E-01	--	--	na	4.9E-01	--	--	--	--	--	--	--	--	--	--	na	4.9E-01
Copper	0	4.3E+00	3.2E+00	na	--	4.3E+00	3.2E+00	na	--	--	--	--	--	--	--	--	--	4.3E+00	3.2E+00	na	--
Cyanide	0	2.2E+01	5.2E+00	na	2.2E+05	2.2E+01	5.2E+00	na	2.2E+05	--	--	--	--	--	--	--	--	2.2E+01	5.2E+00	na	2.2E+05
DDD [C]	0	--	--	na	8.4E-03	--	--	na	8.4E-03	--	--	--	--	--	--	--	--	--	--	na	8.4E-03
DDE [C]	0	--	--	na	5.9E-03	--	--	na	5.9E-03	--	--	--	--	--	--	--	--	--	--	na	5.9E-03
DDT [C]	0	1.1E+00	1.0E-03	na	5.9E-03	1.1E+00	1.0E-03	na	5.9E-03	--	--	--	--	--	--	--	--	1.1E+00	1.0E-03	na	5.9E-03
Demeton	0	--	1.0E-01	na	--	--	1.0E-01	na	--	--	--	--	--	--	--	--	--	--	1.0E-01	na	--
Dibenz(a,h)anthracene [C]	0	--	--	na	4.9E-01	--	--	na	4.9E-01	--	--	--	--	--	--	--	--	--	--	na	4.9E-01
Dibutyl phthalate	0	--	--	na	1.2E+04	--	--	na	1.2E+04	--	--	--	--	--	--	--	--	--	--	na	1.2E+04
Dichloromethane (Methylene Chloride) [C]	0	--	--	na	1.6E+04	--	--	na	1.6E+04	--	--	--	--	--	--	--	--	--	--	na	1.6E+04
1,2-Dichlorobenzene	0	--	--	na	1.7E+04	--	--	na	1.7E+04	--	--	--	--	--	--	--	--	--	--	na	1.7E+04
1,3-Dichlorobenzene	0	--	--	na	2.6E+03	--	--	na	2.6E+03	--	--	--	--	--	--	--	--	--	--	na	2.6E+03
1,4-Dichlorobenzene	0	--	--	na	2.6E+03	--	--	na	2.6E+03	--	--	--	--	--	--	--	--	--	--	na	2.6E+03
3,3-Dichlorobenzidine [C]	0	--	--	na	7.7E-01	--	--	na	7.7E-01	--	--	--	--	--	--	--	--	--	--	na	7.7E-01
Dichlorobromomethane [C]	0	--	--	na	4.6E+02	--	--	na	4.6E+02	--	--	--	--	--	--	--	--	--	--	na	4.6E+02
1,2-Dichloroethane [C]	0	--	--	na	9.9E+02	--	--	na	9.9E+02	--	--	--	--	--	--	--	--	--	--	na	9.9E+02
1,1-Dichloroethylene	0	--	--	na	1.7E+04	--	--	na	1.7E+04	--	--	--	--	--	--	--	--	--	--	na	1.7E+04
1,2-trans-dichloroethylene	0	--	--	na	1.4E+05	--	--	na	1.4E+05	--	--	--	--	--	--	--	--	--	--	na	1.4E+05
2,4-Dichlorophenol	0	--	--	na	7.9E+02	--	--	na	7.9E+02	--	--	--	--	--	--	--	--	--	--	na	7.9E+02
2,4-Dichlorophenoxy acetic acid (2,4-D)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
1,2-Dichloropropane [C]	0	--	--	na	3.9E+02	--	--	na	3.9E+02	--	--	--	--	--	--	--	--	--	--	na	3.9E+02
1,3-Dichloropropene	0	--	--	na	1.7E+03	--	--	na	1.7E+03	--	--	--	--	--	--	--	--	--	--	na	1.7E+03
Dieldrin [C]	0	2.4E-01	5.6E-02	na	1.4E-03	2.4E-01	5.6E-02	na	1.4E-03	--	--	--	--	--	--	--	--	2.4E-01	5.6E-02	na	1.4E-03
Diethyl Phthalate	0	--	--	na	1.2E+05	--	--	na	1.2E+05	--	--	--	--	--	--	--	--	--	--	na	1.2E+05
Di-2-Ethylhexyl Phthalate [C]	0	--	--	na	5.9E+01	--	--	na	5.9E+01	--	--	--	--	--	--	--	--	--	--	na	5.9E+01
2,4-Dimethylphenol	0	--	--	na	2.3E+03	--	--	na	2.3E+03	--	--	--	--	--	--	--	--	--	--	na	2.3E+03
Dimethyl Phthalate	0	--	--	na	2.9E+06	--	--	na	2.9E+06	--	--	--	--	--	--	--	--	--	--	na	2.9E+06
Di-n-Butyl Phthalate	0	--	--	na	1.2E+04	--	--	na	1.2E+04	--	--	--	--	--	--	--	--	--	--	na	1.2E+04
2,4 Dinitrophenol	0	--	--	na	1.4E+04	--	--	na	1.4E+04	--	--	--	--	--	--	--	--	--	--	na	1.4E+04
2-Methyl-4,6-Dinitrophenol	0	--	--	na	7.65E+02	--	--	na	7.7E+02	--	--	--	--	--	--	--	--	--	--	na	7.7E+02
2,4-Dinitrotoluene [C]	0	--	--	na	9.1E+01	--	--	na	9.1E+01	--	--	--	--	--	--	--	--	--	--	na	9.1E+01
Dioxin (2,3,7,8-tetrachlorodibenzo-p-dioxin) (ppq)	0	--	--	na	1.2E-06	--	--	na	na	--	--	--	--	--	--	--	--	--	--	na	na
1,2-Diphenylhydrazine [C]	0	--	--	na	5.4E+00	--	--	na	5.4E+00	--	--	--	--	--	--	--	--	--	--	na	5.4E+00
Alpha-Endosulfan	0	2.2E-01	5.6E-02	na	2.4E+02	2.2E-01	5.6E-02	na	2.4E+02	--	--	--	--	--	--	--	--	2.2E-01	5.6E-02	na	2.4E+02
Beta-Endosulfan	0	2.2E-01	5.6E-02	na	2.4E+02	2.2E-01	5.6E-02	na	2.4E+02	--	--	--	--	--	--	--	--	2.2E-01	5.6E-02	na	2.4E+02
Endosulfan Sulfate	0	--	--	na	2.4E+02	--	--	na	2.4E+02	--	--	--	--	--	--	--	--	--	--	na	2.4E+02
Endrin	0	8.6E-02	3.6E-02	na	8.1E-01	8.6E-02	3.6E-02	na	8.1E-01	--	--	--	--	--	--	--	--	8.6E-02	3.6E-02	na	8.1E-01
Endrin Aldehyde	0	--	--	na	8.1E-01	--	--	na	8.1E-01	--	--	--	--	--	--	--	--	--	--	na	8.1E-01

Parameter (ug/l unless noted)	Background Conc.	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
		Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Ethylbenzene	0	--	--	na	2.9E+04	--	--	na	2.9E+04	--	--	--	--	--	--	--	--	--	--	na	2.9E+04
Fluoranthene	0	--	--	na	3.7E+02	--	--	na	3.7E+02	--	--	--	--	--	--	--	--	--	--	na	3.7E+02
Fluorene	0	--	--	na	1.4E+04	--	--	na	1.4E+04	--	--	--	--	--	--	--	--	--	--	na	1.4E+04
Foaming Agents	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Guthion	0	--	1.0E-02	na	--	--	1.0E-02	na	--	--	--	--	--	--	--	--	--	--	1.0E-02	na	--
Heptachlor [C]	0	5.2E-01	3.8E-03	na	2.1E-03	5.2E-01	3.8E-03	na	2.1E-03	--	--	--	--	--	--	--	--	5.2E-01	3.8E-03	na	2.1E-03
Heptachlor Epoxide [C]	0	5.2E-01	3.8E-03	na	1.1E-03	5.2E-01	3.8E-03	na	1.1E-03	--	--	--	--	--	--	--	--	5.2E-01	3.8E-03	na	1.1E-03
Hexachlorobenzene [C]	0	--	--	na	7.7E-03	--	--	na	7.7E-03	--	--	--	--	--	--	--	--	--	--	na	7.7E-03
Hexachlorobutadiene [C]	0	--	--	na	5.0E+02	--	--	na	5.0E+02	--	--	--	--	--	--	--	--	--	--	na	5.0E+02
Hexachlorocyclohexane Alpha-BHC [C]	0	--	--	na	1.3E-01	--	--	na	1.3E-01	--	--	--	--	--	--	--	--	--	--	na	1.3E-01
Hexachlorocyclohexane Beta-BHC [C]	0	--	--	na	4.6E-01	--	--	na	4.6E-01	--	--	--	--	--	--	--	--	--	--	na	4.6E-01
Hexachlorocyclohexane Gamma-BHC [C] (Lindane)	0	9.5E-01	na	na	6.3E-01	9.5E-01	--	na	6.3E-01	--	--	--	--	--	--	--	--	9.5E-01	--	na	6.3E-01
Hexachlorocyclopentadiene	0	--	--	na	1.7E+04	--	--	na	1.7E+04	--	--	--	--	--	--	--	--	--	--	na	1.7E+04
Hexachloroethane [C]	0	--	--	na	8.9E+01	--	--	na	8.9E+01	--	--	--	--	--	--	--	--	--	--	na	8.9E+01
Hydrogen Sulfide	0	--	2.0E+00	na	--	--	2.0E+00	na	--	--	--	--	--	--	--	--	--	--	2.0E+00	na	--
Indeno (1,2,3-cd) pyrene [C]	0	--	--	na	4.9E-01	--	--	na	4.9E-01	--	--	--	--	--	--	--	--	--	--	na	4.9E-01
Iron	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Isophorone [C]	0	--	--	na	2.6E+04	--	--	na	2.6E+04	--	--	--	--	--	--	--	--	--	--	na	2.6E+04
Kepone	0	--	0.0E+00	na	--	--	0.0E+00	na	--	--	--	--	--	--	--	--	--	--	0.0E+00	na	--
Lead	0	2.6E+01	2.9E+00	na	--	2.6E+01	2.9E+00	na	--	--	--	--	--	--	--	--	--	2.6E+01	2.9E+00	na	--
Malathion	0	--	1.0E-01	na	--	--	1.0E-01	na	--	--	--	--	--	--	--	--	--	--	1.0E-01	na	--
Manganese	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Mercury	0	1.4E+00	7.7E-01	na	5.1E-02	1.4E+00	7.7E-01	na	5.1E-02	--	--	--	--	--	--	--	--	1.4E+00	7.7E-01	na	5.1E-02
Methyl Bromide	0	--	--	na	4.0E+03	--	--	na	4.0E+03	--	--	--	--	--	--	--	--	--	--	na	4.0E+03
Methoxychlor	0	--	3.0E-02	na	--	--	3.0E-02	na	--	--	--	--	--	--	--	--	--	--	3.0E-02	na	--
Mirex	0	--	0.0E+00	na	--	--	0.0E+00	na	--	--	--	--	--	--	--	--	--	--	0.0E+00	na	--
Monochlorobenzene	0	--	--	na	2.1E+04	--	--	na	2.1E+04	--	--	--	--	--	--	--	--	--	--	na	2.1E+04
Nickel	0	6.6E+01	7.4E+00	na	4.6E+03	6.6E+01	7.4E+00	na	4.6E+03	--	--	--	--	--	--	--	--	6.6E+01	7.4E+00	na	4.6E+03
Nitrate (as N)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Nitrobenzene	0	--	--	na	1.9E+03	--	--	na	1.9E+03	--	--	--	--	--	--	--	--	--	--	na	1.9E+03
N-Nitrosodimethylamine [C]	0	--	--	na	8.1E+01	--	--	na	8.1E+01	--	--	--	--	--	--	--	--	--	--	na	8.1E+01
N-Nitrosodiphenylamine [C]	0	--	--	na	1.6E+02	--	--	na	1.6E+02	--	--	--	--	--	--	--	--	--	--	na	1.6E+02
N-Nitrosodi-n-propylamine [C]	0	--	--	na	1.4E+01	--	--	na	1.4E+01	--	--	--	--	--	--	--	--	--	--	na	1.4E+01
Parathion	0	6.5E-02	1.3E-02	na	--	6.5E-02	1.3E-02	na	--	--	--	--	--	--	--	--	--	6.5E-02	1.3E-02	na	--
PCB-1016	0	--	1.4E-02	na	--	--	1.4E-02	na	--	--	--	--	--	--	--	--	--	--	1.4E-02	na	--
PCB-1221	0	--	1.4E-02	na	--	--	1.4E-02	na	--	--	--	--	--	--	--	--	--	--	1.4E-02	na	--
PCB-1232	0	--	1.4E-02	na	--	--	1.4E-02	na	--	--	--	--	--	--	--	--	--	--	1.4E-02	na	--
PCB-1242	0	--	1.4E-02	na	--	--	1.4E-02	na	--	--	--	--	--	--	--	--	--	--	1.4E-02	na	--
PCB-1248	0	--	1.4E-02	na	--	--	1.4E-02	na	--	--	--	--	--	--	--	--	--	--	1.4E-02	na	--
PCB-1254	0	--	1.4E-02	na	--	--	1.4E-02	na	--	--	--	--	--	--	--	--	--	--	1.4E-02	na	--
PCB-1260	0	--	1.4E-02	na	--	--	1.4E-02	na	--	--	--	--	--	--	--	--	--	--	1.4E-02	na	--
PCB Total [C]	0	--	--	na	1.7E-03	--	--	na	1.7E-03	--	--	--	--	--	--	--	--	--	--	na	1.7E-03

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Pentachlorophenol [C]	0	2.6E+00	2.0E+00	na	8.2E+01	2.6E+00	2.0E+00	na	8.2E+01	--	--	--	--	--	--	--	--	**2.6E+00**	**2.0E+00**	**na**	**8.2E+01**
Phenol	0	--	--	na	4.6E+06	--	--	na	4.6E+06	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**4.6E+06**
Pyrene	0	--	--	na	1.1E+04	--	--	na	1.1E+04	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.1E+04**
Radionuclides (pCi/l except Beta/Photon)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
Gross Alpha Activity	0	--	--	na	1.5E+01	--	--	na	1.5E+01	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.5E+01**
Beta and Photon Activity (mrem/yr)	0	--	--	na	4.0E+00	--	--	na	4.0E+00	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**4.0E+00**
Strontium-90	0	--	--	na	8.0E+00	--	--	na	8.0E+00	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**8.0E+00**
Tritium	0	--	--	na	2.0E+04	--	--	na	2.0E+04	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**2.0E+04**
Selenium	0	2.0E+01	5.0E+00	na	1.1E+04	2.0E+01	5.0E+00	na	1.1E+04	--	--	--	--	--	--	--	--	**2.0E+01**	**5.0E+00**	**na**	**1.1E+04**
Silver	0	4.4E-01	--	na	--	4.4E-01	--	na	--	--	--	--	--	--	--	--	--	**4.4E-01**	**--**	**na**	**--**
Sulfate	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
1,1,2,2-Tetrachloroethane [C]	0	--	--	na	1.1E+02	--	--	na	1.1E+02	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.1E+02**
Tetrachloroethylene [C]	0	--	--	na	8.9E+01	--	--	na	8.9E+01	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**8.9E+01**
Thallium	0	--	--	na	6.3E+00	--	--	na	6.3E+00	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**6.3E+00**
Toluene	0	--	--	na	2.0E+05	--	--	na	2.0E+05	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**2.0E+05**
Total dissolved solids	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
Toxaphene [C]	0	7.3E-01	2.0E-04	na	7.5E-03	7.3E-01	2.0E-04	na	7.5E-03	--	--	--	--	--	--	--	--	**7.3E-01**	**2.0E-04**	**na**	**7.5E-03**
Tributyltin	0	4.6E-01	6.3E-02	na	--	4.6E-01	6.3E-02	na	--	--	--	--	--	--	--	--	--	**4.6E-01**	**6.3E-02**	**na**	**--**
1,2,4-Trichlorobenzene	0	--	--	na	9.4E+02	--	--	na	9.4E+02	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**9.4E+02**
1,1,2-Trichloroethane [C]	0	--	--	na	4.2E+02	--	--	na	4.2E+02	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**4.2E+02**
Trichloroethylene [C]	0	--	--	na	8.1E+02	--	--	na	8.1E+02	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**8.1E+02**
2,4,6-Trichlorophenol [C]	0	--	--	na	6.5E+01	--	--	na	6.5E+01	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**6.5E+01**
2-(2,4,5-Trichlorophenoxy) propionic acid (Silvex)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
Vinyl Chloride [C]	0	--	--	na	6.1E+01	--	--	na	6.1E+01	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**6.1E+01**
Zinc	0	4.2E+01	4.3E+01	na	6.9E+04	4.2E+01	4.3E+01	na	6.9E+04	--	--	--	--	--	--	--	--	**4.2E+01**	**4.3E+01**	**na**	**6.9E+04**

Notes:

1. All concentrations expressed as micrograms/liter (ug/l), unless noted otherwise
2. Discharge flow is highest monthly average or Form 2C maximum for Industries and design flow for Municipals
3. Metals measured as Dissolved, unless specified otherwise
4. "C" indicates a carcinogenic parameter
5. Regular WLAs are mass balances (minus background concentration) using the % of stream flow entered above under Mixing Information.
   Antidegradation WLAs are based upon a complete mix.
6. Antideg. Baseline = (0.25(WQC - background conc.) + background conc.) for acute and chronic
   = (0.1(WQC - background conc.) + background conc.) for human health
7. WLAs established at the following stream flows: 1Q10 for Acute, 30Q10 for Chronic Ammonia, 7Q10 for Other Chronic, 30Q5 for Non-carcinogens, Harmonic Mean for Carcinogens, and Annual Average for Dioxin. Mixing ratios may be substituted for stream flows where appropriate.

Metal	Target Value (SSTV)
Antimony	4.3E+03
Arsenic	9.0E+01
Barium	na
Cadmium	2.7E-01
Chromium III	1.7E+01
Chromium VI	6.4E+00
Copper	1.7E+00
Iron	na
Lead	1.8E+00
Manganese	na
Mercury	5.1E-02
Nickel	4.4E+00
Selenium	3.0E+00
Silver	1.8E-01
Zinc	1.7E+01

Note: do not use QL's lower than the minimum QL's provided in agency guidance

1/28/2008 9:45:51 AM

Facility = IMTT VA West
Chemical = Ammonia
Chronic averaging period = 30
WLAa = 17
WLAc = 1.9
Q.L. = 0.1
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 2
Expected Value = .145
Variance = .007569
C.V. = 0.6
97th percentile daily values = .352845
97th percentile 4 day average = .241249
97th percentile 30 day average= .174877
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

No Limit is required for this material

The data are:

0.16
0.13

1/28/2008 9:49:24 AM

Facility = IMTT Va West
Chemical = Chlorides
Chronic averaging period = 4
WLAa = 860000
WLAc = 230000
Q.L. = 1
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 1
Expected Value = 3.3
Variance = 3.9204
C.V. = 0.6
97th percentile daily values = 8.03027
97th percentile 4 day average = 5.49050
97th percentile 30 day average= 3.97997
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

No Limit is required for this material

The data are:

3300

3/20/2008 10:27:59 AM

Facility = IMTT Virginia West
Chemical = Cadmium
Chronic averaging period = 4
WLAa = 1
WLAc = 0.44
Q.L. = 0.3
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 1
Expected Value = 1.8
Variance = 1.1664
C.V. = 0.6
97th percentile daily values = 4.38015
97th percentile 4 day average = 2.99482
97th percentile 30 day average= 2.17089
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

A limit is needed based on Chronic Toxicity
Maximum Daily Limit = 0.643532904983422
Average Weekly limit = 0.643532904983422
Average Monthly LImit = 0.643532904983422

The data are:

1.8

10/23/02 3:47:30 PM

Facility = VA0055409
Chemical = Cadmium
Chronic averaging period = 4
WLAa = 0.64
WLAc = 0.32
Q.L. = 0.5
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 1
Expected Value = 1.3
Variance = .6084
C.V. = 0.6
97th percentile daily values = 3.16344
97th percentile 4 day average = 2.16292
97th percentile 30 day average= 1.56786
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

A limit is needed based on Chronic Toxicity
Maximum Daily Limit = 0.468023930897034
Average Weekly limit = 0.468023930897034
Average Monthly LImit = 0.468023930897034

The data are:

1.3

3/20/2008 10:26:49 AM

Facility = IMTT Virginia West
Chemical = Copper
Chronic averaging period = 4
WLAa = 4.3
WLAc = 3.2
Q.L. = 0.5
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 1
Expected Value = 6
Variance = 12.96
C.V. = 0.6
97th percentile daily values = 14.6005
97th percentile 4 day average = 9.98274
97th percentile 30 day average= 7.23631
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

A limit is needed based on Acute Toxicity
Maximum Daily Limit = 4.3
Average Weekly limit = 4.3
Average Monthly LImit = 4.3

The data are:

6

10/23/02 3:51:56 PM

Facility = VA0055409
Chemical = Copper
Chronic averaging period = 4
WLAa = 3.9
WLAc = 3
Q.L. = 10
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 1
Expected Value = 10
Variance = 36
C.V. = 0.6
97th percentile daily values = 24.3341
97th percentile 4 day average = 16.6379
97th percentile 30 day average= 12.0605
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

A limit is needed based on Acute Toxicity
Maximum Daily Limit = 3.9
Average Weekly limit = 3.9
Average Monthly LImit = 3.9

The data are:

10

3/20/2008 9:27:21 AM

Facility = IMTT Virginia West
Chemical = Lead
Chronic averaging period = 4
WLAa = 26
WLAc = 2.9
Q.L. = 0.5
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 2
Expected Value = 17.5
Variance = 110.25
C.V. = 0.6
97th percentile daily values = 42.5848
97th percentile 4 day average = 29.1163
97th percentile 30 day average= 21.1059
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

A limit is needed based on Chronic Toxicity
Maximum Daily Limit = 4.24146687375437
Average Weekly limit = 4.24146687375437
Average Monthly LImit = 4.24146687375437

The data are:

19
16

3/20/2008 10:25:32 AM

Facility = IMTT Virginia West
Chemical = Zinc
Chronic averaging period = 4
WLAa = 42
WLAc = 43
Q.L. = 2
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 1
Expected Value = 102
Variance = 3745.44
C.V. = 0.6
97th percentile daily values = 248.208
97th percentile 4 day average = 169.706
97th percentile 30 day average= 123.017
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

A limit is needed based on Acute Toxicity
Maximum Daily Limit = 42
Average Weekly limit = 42.0000000000001
Average Monthly LImit = 42.0000000000001

The data are:

102

10/23/02 3:53:11 PM

Facility = VA0055409
Chemical = Zinc
Chronic averaging period = 4
WLAa = 30
WLAc = 27
Q.L. = 10
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 2
Expected Value = 330
Variance = 39204
C.V. = 0.6
97th percentile daily values = 803.027
97th percentile 4 day average = 549.050
97th percentile 30 day average= 397.997
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

A limit is needed based on Acute Toxicity
Maximum Daily Limit = 30
Average Weekly limit = 30
Average Monthly LImit = 30

The data are:

200
460

Attachment F

Name Change Correspondence, NPDES Permit Rating Worksheet, WET Limit Correspondence

IMTT – Richmond

A PARTNERSHIP

Terminal Address: 5500 Old Osborne Turnpike, Richmond, Virginia 23231 • **Phone:** (804) 226 - 2650• **Fax:** (804) 226 – 2653

December 14, 2007

VIA First Class Mail
Mr. Jeremy Kazio
Virginia DEQ, Piedmont Regional Office
4949-A Cox Road
Glen Allen, VA 23060

Re: IMTT-Richmond Permits VA0055409 and VA0054291

Dear Mr. Kazio:

IMTT-Richmond currently holds VPDES permit # VA0055409 and VA0054291 for the discharge of wastewater from its Richmond West and East Terminals, respectively. In addition, IMTT-Richmond has timely applied for renewal of these permits, and such applications are still pending. As you are aware, the corporate structures of IMTT-Richmond and its sister partnership, IMTT-Chesapeake, are being reorganized. The general partners of both partnerships are all subsidiaries of a single corporation, IMTT Holdings, Inc. As part of this restructuring, IMTT-Richmond will be merged with and into IMTT-Chesapeake. Subsequently, IMTT-Chesapeake will change its name to IMTT-Virginia to reflect the fact that the merged partnership will hold assets throughout the state.

This reorganization will not result in any changes to the current operations at the Richmond Terminals. As a result, we are requesting a transfer of permit # VA0055409 and VA0054291 from IMTT-Richmond to IMTT-Virginia effective January 1, 2008, the date on which IMTT-Virginia will become responsible for operations at the Richmond West and East Terminals.

We understand that instead of reissuing the current permits in the name of IMTT-Virginia, DEQ will instead note the ownership change in the file, and issue the permit renewals in the name of IMTT-

Virginia in February of 2008. We agree with this approach, so long as you can confirm that IMTT-Virginia may legally operate pursuant to the current permits for the period beginning on January 1, 2008 to the time that the permits are renewed. Thank you for your attention to this matter, and please contact me with any questions or if you need additional information.

Sincerely,

Michael T. Spence
Terminal Manager

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE
4949-A Cox Road, Glen Allen, Virginia 23060
(804) 527-5020 Fax (804) 527-5106
www.deq.virginia.gov

L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

Gerard Seeley, Jr.
Regional Director

IMTT-Virginia
5500 Old Osborne Turnpike
Richmond, VA 23231

Attn: Michael T. Spence, Terminal Manager

RE: Facility Name Change – IMTT-Richmond West/East (VPDES Permit No. VA0055409 and VA0054291) to IMTT-Virginia

Dear Mr. Spence:

Your VPDES permit and fact sheet will be modified upon permit reissuance in accordance with your letter dated December 14, 2007. The modification will consist of changing the facility owner name and facility name on the permit and fact sheet as follows:

VPDES Permit No. VA0055409

From:
Current Permit
(Issued February 4, 2003/Expires February 3, 2008)

Owner: International Matex Tank Terminals
Facility Name: IMTT- Richmond West

To:
Permit Reissuance

Owner: IMTT Holdings, Inc.
Facility Name: IMTT-Virginia West

VPDES Permit No. VA0054291

From:
Current Permit
(Issued May 21, 2003/Expires May 20, 2008)

Owner: International Matex Tank Terminals
Facility Name: IMTT-Richmond East

To:
Permit Reissuance

Owner: IMTT Holdings, Inc.
Facility Name: IMTT-Virginia East

Both the Department of Environmental Quality (DEQ) and you, the permittee, have agreed that it is more efficient, due to the proximity of the current permits' expiration, to make the name changes referenced above to each permit during the permit reissuance. Each of the facilities' 2008 permit reissuance applications have been received and are pending review for completeness.

Under these circumstances, DEQ approves the legal operation of each facility under the new names from the date of January 1, 2008 until the time of each respective permit's reissuance.

If you have any questions regarding this decision, please contact me at (804) 527-5044 or jskazio@deq.virginia.gov.

Sincerely,

Jeremy Kazio
Environmental Specialist II

NPDES PERMIT RATING WORK SHEET

☐ Regular Addition
☐ DiscretionaryAddition
☐ Score change, but no status change
☐ Deletion

NPDES NO. VA0055409

Facility Name: IMTT Virginia West

City: Richmond

Receiving Water: Unnamed Tributary to the James River

Reach Number: _____

Is this facility a steam electric power plant (SIC=4911) with one or more of the following characteristics?
1. Power output 500 MW or greater (not using a cooling pond/lake)
2. A nuclear power plant
3. Cooling water discharge greater than 25% of the receiving stream's 7Q10 flow rate

☐ YES; score is 600 (stop here) ☐ NO (continue)

Is this permit for a municipal separate storm sewer serving a population greater than 100,000?

☐ YES; score is 700 (stop here)
☐ NO (continue)

FACTOR 1: Toxic Pollutant Potential

PCS SIC Code: _____ Primary SIC Code: 4226 Other SIC Codes: NONE
Industrial Subcategory Code: _____ (Code 000 if no subcategory)

Determine the Toxicity potential from Appendix A. Be sure to use the TOTAL toxicity potential column and check one)

Toxicity Group Points	Code	Points	Toxicity Group	Code	Points	Toxicity Group	Code
☐ No process waste streams	0	0	☐ 3.	3	15	☐ 7.	7 35
X 1.	1	5	☐ 4.	4	20	☐ 8.	8 40
☐ 2.	2	10	☐ 5.	5	25	☐ 9.	9 45
			☐ 6.	6	30	☐ 10.	10 50

Code Number Checked: 1

Total Points Factor 1: 5

FACTOR 2: Flow/Stream Flow Volume (*Complete either Section A or Section B; check only one)*

Section A ☐ Wastewater Flow Only Considered

Wastewater Type (See Instructions)		Code	Points
Type I: Flow < 5 MGD	☐	11	0
Flow 5 to 10 MGD	☐	12	10
Flow > 10 to 50 MGD	☐	13	20
Flow > 50 MGD	☐	14	30
Type II: Flow < 1 MGD	☐	21	10
Flow 1 to 5 MGD	☐	22	20
Flow > 5 to 10 MGD	☐	23	30
Flow > 10 MGD	☐	24	50
Type III: Flow < 1 MGD	☐	31	0
Flow 1 to 5 MGD	☐	32	10
Flow > 5 to 10 MGD	☐	33	20
Flow > 10 MGD	☐	34	30

Section B ☐ Wastewater and Stream Flow Considered

Wastewater Type (See Instructions)	Percent of instream Wastewater Concentration at Receiving Stream Low Flow		Code	Points
Type I/III:	< 10 %	☐	41	0
	10 % to < 50 %	☐	42	10
	> 50 %	☐	43	20
Type II:	< 10 %	☐	51	0
	10 % to <50 %	☐	52	20
	> 50 %	X	53	30

Code Checked from Section A or B: 53

Total Points Factor 2: 30

FACTOR 3: Conventional Pollutants
(only when limited by the permit)

NPDES NO: VA0055409

A. Oxygen Demanding Pollutant: (check one) | |BOD ☐ COD ☐ Other: _____

		Code	*Points*
Permit Limits: (check one) ☐	< 100 lbs/day	1	0
☐	100 to 1000 lbs/day	2	5
☐	> 1000 to 3000 lbs/day	3	15
☐	> 3000 lbs/day	4	20

Code Checked: _____

Points Scored: 0

B. Total Suspended Solids (TSS)

		Code	*Points*
Permit Limits: (check one) ☐	< 100 lbs/day	1	0
☐	100 to 1000 lbs/day	2	5
☐	> 1000 to 5000 lbs/day	3	15
☐	> 5000 lbs/day	4	20

Code Checked: _____

Points Scored: 0

C. Nitrogen Pollutant: (check one) ☐ Ammonia ☐ Other: _____

	Nitrogen Equivalent	*Code*	*Points*
Permit Limits: (check one) ☐	< 300 lbs/day	1	0
☐	300 to 1000 lbs/day	2	5
☐	> 1000 to 3000 lbs/day	3	15
☐	> 3000 lbs/day	4	20

Code Checked: _____

Points Scored: 0

Total Points Factor 3: 0

FACTOR 4: Public Health Impact

Is there a public drinking water supply located within 50 miles downstream of the effluent discharge (this includes any body of water to which the receiving water is a tributary)? A public drinking water supply may include infiltration galleries, or other methods of conveyance that ultimately get water from the above referenced supply.

X YES (If yes, check toxicity potential number below)

☐ NO (If no, go to Factor 5)

Determine the *human health* toxicity potential from Appendix A. Use the same SIC code and subcategory reference as in Factor 1. (Be sure to use the human health toxicity group column ☐ check one below)

Toxicity Group	Code	Points	Toxicity Group	Code	Points	Toxicity Group	Code	Points
☐ No process waste streams	0	0	☐ 3.	3	0	☐ 7.	7	15
X 1.	1	0	☐ 4.	4	0	☐ 8.	8	20
☐ 2.	2	0	☐ 5.	5	5	☐ 9.	9	25
			☐ 6.	6	10	☐ 10.	10	30

Code Number Checked: 1

Total Points Factor 4: 0

FACTOR 5: Water Quality Factors

NPDES NO: VA0055409

A. *Is (or will) one or more of the effluent discharge limits based on water quality factors of the receiving stream (rather than technology-based federal effluent guidelines, or technology-based state effluent guidelines), or has a wasteload allocation been assigned to the discharge:*

		Code	Points
X	Yes	1	10
☐	No	2	0

B. *Is the receiving water in compliance with applicable water quality standards for pollutants that are water quality limited in the permit?*

		Code	Points
X	Yes	1	0
☐	No	2	5

C. *Does the effluent discharged from this facility exhibit the reasonable potential to violate water quality standards due to whole effluent toxicity?*

		Code	Points
☐	Yes	1	10
X	No	2	0

Code Number Checked: A 1 B 1 C 2

Points Factor 5: A 10 + B 0 + C 0 = 10 TOTAL

FACTOR 6: Proximity to Near Coastal Waters

A. *Base Score: Enter flow code here (from Factor 2):* 53 *Enter the multiplication factor that corresponds to the flow code:* 0.60

Check appropriate facility HPRI Code (from PCS):

	HPRI#	*Code*	*HPRI Score*
☐	1	1	20
☐	2	2	0
X	3	3	30
☐	4	4	0
	5	5	20

HPRI code checked: 3

Flow Code	*Multiplication Factor*
11, 31, or 41	0.00
12, 32, or 42	0.05
13, 33, or 43	0.10
14 or 34	0.15
21 or 51	0.10
22 or 52	0.30
23 or 53	0.60
24	1.00

Base Score: (HPRI Score) 0 X (Multiplication Factor) 0.6 = 0 (TOTAL POINTS)

B. *Additional Points ☐ NEP Program*
For a facility that has an HPRI code of 3, does the facility discharge to one of the estuaries enrolled in the National Estuary Protection (NEP) program (see instructions) or the Chesapeake Bay?

		Code	Points
X	Yes	1	10
☐	No	2	0

C. *Additional Points ☐ Great Lakes Area of Concern*
For a facility that has an HPRI code of 5, does the facility discharge any of the pollutants of concern into one of the Great Lakes' 31 areas of concern (see Instructions)

		Code	Points
☐	Yes	1	10
☐	No	2	0

Code Number Checked: A 4 B 1 C N/A

Points Factor 6: A 0 + B 10 + C 0 = 10 TOTAL

SCORE SUMMARY

NPDES NO: VA0055409

Factor	Description	Total Points
1	Toxic Pollutant Potential	5
2	Flows/Streamflow Volume	30
3	Conventional Pollutants	0
4	Public Health Impacts	0
5	Water Quality Factors	10
6	Proximity to Near Coastal Waters	10
	TOTAL (Factors 1 through 6)	55

S1. Is the total score equal to or greater than 80? ☐ Yes (Facility is a major) X No

S2. If the answer to the above questions is no, would you like this facility to be discretionary major?

X No

☐ Yes (Add 500 points to the above score and provide reason below:

Reason:

NEW SCORE: _____

OLD SCORE: _____

Jeremy Kazio
Permit Reviewer's Name

(804) 527-5044
Phone Number

March 28, 2008
Date

Kazio,Jeremy

From: DeBiasi,Deborah
Sent: Tuesday, March 25, 2008 1:22 PM
To: Kazio,Jeremy
Subject: RE: IMTT Virginia - West: Toxicity Testing

Hello there -

Where are the 2007 tests? Isn't the permittee sending you the test reports? You should be able to check over the data to see if it's valid before you use it - the good part is that it's from CBI which is a good lab, so it should be ok.

You don't want to make the limit less stringent or reduce the frequency. The same language is ok. Just copy me on the blurb that you'll put in the fact sheet to justify what you are doing.

-----Original Message-----
From: Kazio,Jeremy
Sent: Tuesday, March 25, 2008 1:08 PM
To: DeBiasi,Deborah
Subject: IMTT Virginia - West: Toxicity Testing

Hi Deborah,

I hope all is well with you.

I have a facility who was given an acute WET limitation during their last permit cycle in 2003 → NOAEC=100% (TUa=1.0)

The limitation had a compliance period that ended on February 4, 2006, which means the limit has now been in effect for a little over two years. They have shown compliance with every effluent sample that they have had tested.

Because of antibacksliding, I cannot make this limit less stringent, nor can I reduce their monitoring frequency because of the nature of their discharge. Is there I reason that I need to run this through STATS and send you the lengthy memorandum? I planned on using the same language that you approved in the 2003 permit. Below I will place a data summary chart and the language I planned on using. Please let me know if this email is enough for your "okay" on this, or if you would prefer the memorandum. Thank you very much !!!

- Jeremy

WET Data - IMTT Virginia West (December 2003 - March 2008)

	Ceriodaphnia Dubia						*Pimpl*		
Date of Test	NOAEC (%)	TUa	LC50 (%)	Survival of Test Organisms (%)		In Compliance?	NOAEC (%)	TUa	LC50 (%)
				Control Group	100% Effluent				
12/30/2004	100	1.00	>100	100	100	YES	100	1.00	>100
5/20/2005	100					YES	100		
12/12/2005	100					YES	100		

6/30/2006	100					YES	100		
11/29/2006	100	1.00	>100	100	95	YES	100	1.00	>100
2/14/2008	100	1.00	>100	100	95	YES	100	1.00	>100

	There are no data in DEQ's files. This information was obtained in a written document from the permittee's laboratory (Coastal Bioanalysts) on January 2, 2008.

Whole Effluent Toxicity (WET) Limitation and Monitoring Requirements

a. **The Whole Effluent Toxicity limitation of NOAEC = 100% (TUa=1.0) in Part I.A. is a final limit that shall be implemented as specified below:**

(1) The permittee shall conduct semi-annual acute toxicity testing using grab samples of final effluent from outfall 001. The acute tests to use are:

48-Hour Static Acute Test using *Ceriodaphnia dubia*
48-Hour Static Acute Test using *Pimephales promelas*

(2) These acute tests are to be conducted using a minimum of 4 replicates with 5 organisms each, for the control and effluent. The NOAEC (No Observed Adverse Effect Concentration) shall be reported either as 100% or <100% (less than 100%). The effluent will be in compliance if the survival of the test organisms in both the control and the 100% effluent exposures equals or exceeds 90%. If the survival in the effluent is less and this value is significantly different from the control survival, as determined by the hypotheses testing, the NOAEC is less than 100% and the effluent is not in compliance. Tests in which control survival is less than 90% are not acceptable.

(3) Two copies of the toxicity test results shall be submitted with the DMR. Test procedures and reporting shall be in accordance with the WET testing methods cited in 40 CFR 136.6.

b. **This permit may be modified or revoked and reissued to include pollutant specific limits in lieu of a WET limit should it be demonstrated that toxicity is due to specific parameters. The pollutant specific limits must control the toxicity.**

Jeremy S. Kazio
Environmental Specialist II
VA DEQ Piedmont Regional Office
4949-A Cox Road
Glen Allen, VA 23060
Phone: 804/527-5044
Fax: 804/527-5106

Revised 2/2003

State "Transmittal Checklist" to Assist in Targeting Municipal and Industrial Individual NPDES Draft Permits for Review

Part I. State Draft Permit Submission Checklist

In accordance with the MOA established between the Commonwealth of Virginia and the United States Environmental Protection Agency, Region III, the Commonwealth submits the following draft National Pollutant Discharge Elimination System (NPDES) permit for Agency review and concurrence.

Facility Name: IMTT Virginia-West

NPDES Permit Number: VA0055409

Permit Writer Name: Jeremy Kazio

Date: March 27, 2008

Major [ ] **Minor** [X] **Industrial** [X] **Municipal** [ ]

I.A. Draft Permit Package Submittal Includes:	**Yes**	**No**	**N/A**
1. Permit Application?	X		
2. Complete Draft Permit (for renewal or first time permit – entire permit, including boilerplate information)?	X		
3. Copy of Public Notice?		X	
4. Complete Fact Sheet?	X		
5. A Priority Pollutant Screening to determine parameters of concern?	X		
6. A Reasonable Potential analysis showing calculated WQBELs?	X		
7. Dissolved Oxygen calculations?			X
8. Whole Effluent Toxicity Test summary and analysis?	X		
9. Permit Rating Sheet for new or modified industrial facilities?	X		

I.B. Permit/Facility Characteristics	**Yes**	**No**	**N/A**
1. Is this a new or currently unpermitted facility?		X	
2. Are all permissible outfalls (including combined sewer overflow points, non-process water and storm water) from the facility properly identified and authorized in the permit?	X		
3. Does the fact sheet **or** permit contain a description of the wastewater treatment process?	X		

I.B. Permit/Facility Characteristics – cont.	Yes	No	N/A
4. Does the review of PCS/DMR data for at least the last 3 years indicate significant non-compliance with the existing permit?		X	
5. Has there been any change in streamflow characteristics since the last permit was developed?		X	
6. Does the permit allow the discharge of new or increased loadings of any pollutants?		X	
7. Does the fact sheet **or** permit provide a description of the receiving water body(s) to which the facility discharges, including information on low/critical flow conditions and designated/existing uses?	X		
8. Does the facility discharge to a 303(d) listed water?		X	
a. Has a TMDL been developed and approved by EPA for the impaired water?			X
b. Does the record indicate that the TMDL development is on the State priority list and will most likely be developed within the life of the permit?			X
c. Does the facility discharge a pollutant of concern identified in the TMDL or 303(d) listed water?			X
9. Have any limits been removed, or are any limits less stringent, than those in the current permit?		X	
10. Does the permit authorize discharges of storm water?		X	
11. Has the facility substantially enlarged or altered its operation or substantially increased its flow or production?		X	
12. Are there any production-based, technology-based effluent limits in the permit?	X		
13. Do any water quality-based effluent limit calculations differ from the State's standard policies or procedures?		X	
14. Are any WQBELs based on an interpretation of narrative criteria?		X	
15. Does the permit incorporate any variances or other exceptions to the State's standards or regulations?		X	
16. Does the permit contain a compliance schedule for any limit or condition?	X		
17. Is there a potential impact to endangered/threatened species or their habitat by the facility's discharge(s)?		X	
18. Have impacts from the discharge(s) at downstream potable water supplies been evaluated?	X		
19. Is there any indication that there is significant public interest in the permit action proposed for this facility?		X	
20. Have previous permit, application, and fact sheet been examined?	X		

Part II. NPDES Draft Permit Checklist

Region III NPDES Permit Quality Review Checklist – For Non-Municipals

(To be completed and included in the record for all non-POTWs)

II.A. Permit Cover Page/Administration	Yes	No	N/A
1. Does the fact sheet **or** permit describe the physical location of the facility, including latitude and longitude (not necessarily on permit cover page)?	X		
2. Does the permit contain specific authorization-to-discharge information (from where to where, by whom)?	X		

II.B. Effluent Limits – General Elements	Yes	No	N/A
1. Does the fact sheet describe the basis of final limits in the permit (e.g., that a comparison of technology and water quality-based limits was performed, and the most stringent limit selected)?	X		
2. Does the fact sheet discuss whether "antibacksliding" provisions were met for any limits that are less stringent than those in the previous NPDES permit?			X

II.C. Technology-Based Effluent Limits (Effluent Guidelines & BPJ)	Yes	No	N/A
1. Is the facility subject to a national effluent limitations guideline (ELG)?			X
a. If yes, does the record adequately document the categorization process, including an evaluation of whether the facility is a new source or an existing source?			
b. If no, does the record indicate that a technology-based analysis based on Best Professional Judgement (BPJ) was used for all pollutants of concern discharged at treatable concentrations?	X		
2. For all limits developed based on BPJ, does the record indicate that the limits are consistent with the criteria established at 40 CFR 125.3(d)?	X		
3. Does the fact sheet adequately document the calculations used to develop both ELG and /or BPJ technology-based effluent limits?		X	
4. For all limits that are based on production or flow, does the record indicate that the calculations are based on a "reasonable measure of ACTUAL production" for the facility (not design)?	X		
5. Does the permit contain "tiered" limits that reflect projected increases in production or flow?		X	
a. If yes, does the permit require the facility to notify the permitting authority when alternate levels of production or flow are attained?			X
6. Are technology-based permit limits expressed in appropriate units of measure (e.g., concentration, mass, SU)?	X		

II.C. Technology-Based Effluent Limits (Effluent Guidelines & BPJ) – cont.	Yes	No	N/A
7. Are all technology-based limits expressed in terms of both maximum daily, weekly average, and/or monthly average limits?		X	
8. Are any final limits less stringent than required by applicable effluent limitations guidelines or BPJ?		X	

II.D. Water Quality-Based Effluent Limits	Yes	No	N/A
1. Does the permit include appropriate limitations consistent with 40 CFR 122.44(d) covering State narrative and numeric criteria for water quality?	X		
2. Does the record indicate that any WQBELs were derived from a completed and EPA approved TMDL?		X	
3. Does the fact sheet provide effluent characteristics for each outfall?	X		
4. Does the fact sheet document that a "reasonable potential" evaluation was performed?	X		
a. If yes, does the fact sheet indicate that the "reasonable potential" evaluation was performed in accordance with the State's approved procedures?	X		
b. Does the fact sheet describe the basis for allowing or disallowing in-stream dilution or a mixing zone?	X		
c. Does the fact sheet present WLA calculation procedures for all pollutants that were found to have "reasonable potential"?	X		
d. Does the fact sheet indicate that the "reasonable potential" and WLA calculations accounted for contributions from upstream sources (i.e., do calculations include ambient/background concentrations where data are available)?		X	
e. Does the permit contain numeric effluent limits for all pollutants for which "reasonable potential" was determined?	X		
5. Are all final WQBELs in the permit consistent with the justification and/or documentation provided in the fact sheet?	X		
6. For all final WQBELs, are BOTH long-term (e.g., average monthly) AND short-term (e.g., maximum daily, weekly average, instantaneous) effluent limits established?	X		
7. Are WQBELs expressed in the permit using appropriate units of measure (e.g., mass, concentration)?	X		
8. Does the fact sheet indicate that an "antidegradation" review was performed in accordance with the State's approved antidegradation policy?	X		

II.E. Monitoring and Reporting Requirements	Yes	No	N/A
1. Does the permit require at least annual monitoring for all limited parameters?	X		
a. If no, does the fact sheet indicate that the facility applied for and was granted a monitoring waiver, AND, does the permit specifically incorporate this waiver?			X
2. Does the permit identify the physical location where monitoring is to be performed for each outfall?	X		
3. Does the permit require testing for Whole Effluent Toxicity in accordance with the State's standard practices?	X		

II.F. Special Conditions	Yes	No	N/A
1. Does the permit require development and implementation of a Best Management Practices (BMP) plan or site-specific BMPs?		X	
a. If yes, does the permit adequately incorporate and require compliance with the BMPs?			X
2. If the permit contains compliance schedule(s), are they consistent with statutory and regulatory deadlines and requirements?	X		
3. Are other special conditions (e.g., ambient sampling, mixing studies, TIE/TRE, BMPs, special studies) consistent with CWA and NPDES regulations?			X

II.G. Standard Conditions	Yes	No	N/A
1. Does the **permit** contain all 40 CFR 122.41 standard conditions or the State equivalent (or more stringent) conditions?	X		

List of Standard Conditions – 40 CFR 122.41

Duty to comply
Duty to reapply
Need to halt or reduce activity not a defense
Duty to mitigate
Proper O & M
Permit actions
Property rights
Duty to provide information
Inspections and entry
Monitoring and records
Signatory requirement
Bypass
Upset
Reporting Requirements
Planned change
Anticipated noncompliance
Transfers
Monitoring reports
Compliance schedules
24-Hour reporting
Other non-compliance

2. Does the permit contain the additional standard condition (or the State equivalent or more stringent conditions) for existing non-municipal dischargers regarding pollutant notification levels [40 CFR 122.42(a)]?	X		

Part III. Signature Page

Based on a review of the data and other information submitted by the permit applicant, and the draft permit and other administrative records generated by the Department/Division and/or made available to the Department/Division, the information provided on this checklist is accurate and complete, to the best of my knowledge.

Name	Jeremy Kazio
Title	Environmental Specialist II
Signature	
Date	March 27, 2008

Please print or type in the unshaded areas only.

Form Approved. OMB No. 2040-0086.

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

Kozio

RECEIVED MAR 13 2008 PRO

I. EPA I.D. NUMBER

S		T/A	C
F	VA0055409		D
1	2 — 13	14	15

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold-faced terms**.

SPECIFIC QUESTIONS	Mark "X" YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
	16	17	18
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
	19	20	21
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	X		
	22	23	24
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
	25	26	27
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)		X	
	28	29	30
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
	31	32	33
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
	34	35	36
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
	37	38	39
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
	40	41	42
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
	43	44	45

III. NAME OF FACILITY

C 1 SKIP: IMTT-Virginia

15 | 16 – 29 | 30 — 69

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
C 2 Spence, Michael Terminal Manager	(804) 226-2650
15 — 16 — 45	46 — 48 | 49 — 51 | 52 — 55

V. FACILTY MAILING ADDRESS

A. STREET OR P.O. BOX

C 3 5500 Old Osborne Turnpike

15 — 16 — 45

B. CITY OR TOWN	C. STATE	D. ZIP CODE
C 4 Richmond	VA	23231
15 — 16 — 40	41 — 42	47 — 51

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

C 5 5500 Old Osborne Turnpike

15 — 16 — 45

B. COUNTY NAME

Henrico

46 — 70

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
C 6 Richmond	VA	23231	
15 — 16 — 40	41 — 42	47 — 51	52 — 54

CONTINUED FROM THE FRONT

VII. SIC CODES *(4-digit, in order of priority)*

A. FIRST	B. SECOND
4226 (specify) Special Warehousing and Storage	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME	B. Is the name listed in Item VIII-A also the owner?
IMTT-Virginia	☑ YES ☐ NO

C. STATUS OF OPERATOR *(Enter the appropriate letter into the answer box: if "Other," specify.)*			D. PHONE *(area code & no.)*
F = FEDERAL S = STATE P = PRIVATE	M = PUBLIC *(other than federal or state)* O = OTHER *(specify)*	P (specify)	A (804) 226-2650

E. STREET OR P.O. BOX				IX. INDIAN LAND
5500 Old Osborne Turnpike	F. CITY OR TOWN	G. STATE	H. ZIP CODE	Is the facility located on Indian lands?
	Richmond	VA	23231	☐ YES ☑ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES *(Discharges to Surface Water)*	D. PSD *(Air Emissions from Proposed Sources)*
9 N VA0055409	9 P
B. UIC *(Underground Injection of Fluids)*	**E. OTHER** *(specify)*
9 U	9 (specify)
C. RCRA *(Hazardous Wastes)*	**E. OTHER** *(specify)*
9 R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers, and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS *(provide a brief description)*

For-hire, Bulk liquid storage and transfer terminal.

XIII. CERTIFICATION *(see instructions)*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE *(type or print)*	B. SIGNATURE	C. DATE SIGNED
Michael T. Spence Terminal Manager		09/27/2007

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only.

EPA I.D. NUMBER (*copy from Item 1 of Form 1*) VA0055409

Form Approved.
OMB No. 2040-0086.
Approval expires 3-31-98.

FORM **2C** NPDES

U.S. ENVIRONMENTAL PROTECTION AGENCY
APPLICATION FOR PERMIT TO DISCHARGE WASTEWATER
EXISTING MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURE OPERATIONS
Consolidated Permits Program

I. OUTFALL LOCATION

For each outfall, list the latitude and longitude of its location to the nearest 15 seconds and the name of the receiving water.

A. OUTFALL NUMBER (*list*)	B. LATITUDE			C. LONGITUDE			D. RECEIVING WATER (*name*)
	1. DEG.	2. MIN.	3. SEC.	1. DEG.	2. MIN.	3. SEC.	
001	37	30	30	77	24	50	Unnamed tributary of the James River

II. FLOWS, SOURCES OF POLLUTION, AND TREATMENT TECHNOLOGIES

A. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed descriptions in Item B. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a water balance cannot be determined (*e.g., for certain mining activities*), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.

B. For each outfall, provide a description of: (1) All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and storm water runoff; (2) The average flow contributed by each operation; and (3) The treatment received by the wastewater. Continue on additional sheets if necessary.

1. OUT-FALL NO. (*list*)	2. OPERATION(S) CONTRIBUTING FLOW		3. TREATMENT		
	a. OPERATION (*list*)	b. AVERAGE FLOW (*include units*)	a. DESCRIPTION	b. LIST CODES FROM TABLE 2C-1	
001	Stormwater runoff from truck loading	approximately 5,000 gals/day	oil separation by oil/water separator, activated carbon box and sediment basin	1-H	
	area, truck unloading area and tank			2-A	
	containment areas				

OFFICIAL USE ONLY (*effluent guidelines sub-categories*)

CONTINUED FROM THE FRONT

C. Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?

☑ YES (*complete the following table*) ☐ NO (*go to Section III*)

1. OUTFALL NUMBER (*list*)	2. OPERATION(S) CONTRIBUTING FLOW (*list*)	3. FREQUENCY a. DAYS PER WEEK (*specify average*)	3. FREQUENCY b. MONTHS PER YEAR (*specify average*)	4. FLOW a. FLOW RATE (*in mgd*) 1. LONG TERM AVERAGE	4. FLOW a. FLOW RATE (*in mgd*) 2. MAXIMUM DAILY	4. FLOW B. TOTAL VOLUME (*specify with units*) 1. LONG TERM AVERAGE	4. FLOW B. TOTAL VOLUME (*specify with units*) 2. MAXIMUM DAILY	C. DURATION (*in days*)
001	Hydrostatic test water ***This option will only be utilized should we have major work performed on our tankage that would require a hydro test in order to bring the tank back into specifications for API 653. There is a good chance that we would never use this option.	0	0	.5	.5	.5 mgd	.5 mgd	varies

III. PRODUCTION

A. Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?

☑ YES (*complete Item III-B*) ☐ NO (*go to Section IV*)

B. Are the limitations in the applicable effluent guideline expressed in terms of production (*or other measure of operation*)?

☐ YES (*complete Item III-C*) ☑ NO (*go to Section IV*)

C. If you answered "yes" to Item III-B, list the quantity which represents an actual measurement of your level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.

1. AVERAGE DAILY PRODUCTION a. QUANTITY PER DAY	1. AVERAGE DAILY PRODUCTION b. UNITS OF MEASURE	1. AVERAGE DAILY PRODUCTION c. OPERATION, PRODUCT, MATERIAL, ETC. (*specify*)	2. AFFECTED OUTFALLS (*list outfall numbers*)

IV. IMPROVEMENTS

A. Are you now required by any Federal, State or local authority to meet any implementation schedule for the construction, upgrading or operations of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

☐ YES (*complete the following table*) ☑ NO (*go to Item IV-B*)

1. IDENTIFICATION OF CONDITION, AGREEMENT, ETC.	2. AFFECTED OUTFALLS a. NO.	2. AFFECTED OUTFALLS b. SOURCE OF DISCHARGE	3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COMPLIANCE DATE a. REQUIRED	4. FINAL COMPLIANCE DATE b. PROJECTED

B. OPTIONAL: You may attach additional sheets describing any additional water pollution control programs (*or other environmental projects which may affect your discharges*) you now have underway or which you plan. Indicate whether each program is now underway or planned, and indicate your actual or planned schedules for construction.

☐ MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAMS IS ATTACHED

EPA I.D. NUMBER (*copy from Item 1 of Form 1*)
VA0055409

CONTINUED FROM PAGE 2

V. INTAKE AND EFFLUENT CHARACTERISTICS

A, B, & C: See instructions before proceeding – Complete one set of tables for each outfall – Annotate the outfall number in the space provided.
NOTE: Tables V-A, V-B, and V-C are included on separate sheets numbered V-1 through V-9.

D. Use the space below to list any of the pollutants listed in Table 2c-3 of the instructions, which you know or have reason to believe is discharged or may be discharged from any outfall. For every pollutant you list, briefly describe the reasons you believe it to be present and report any analytical data in your possession.

1. POLLUTANT	2. SOURCE	1. POLLUTANT	2. SOURCE
Benzene Toluene Xylene Ethyl Benzene	Avgas		

VI. POTENTIAL DISCHARGES NOT COVERED BY ANALYSIS

Is any pollutant listed in Item V-C a substance or a component of a substance which you currently use or manufacture as an intermediate or final product or byproduct?

☐ YES (*list all such pollutants below*) ☑ NO (*go to Item VI-B*)

CONTINUED FROM THE FRONT

VII. BIOLOGICAL TOXICITY TESTING DATA

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

☑ YES (*identify the test(s) and describe their purposes below*) ☐ NO (*go to Section VIII*)

Biological tests as required by our VPDES permit. These tests were submitted to the virginia DEQ with our DMRs.

VIII. CONTRACT ANALYSIS INFORMATION

Were any of the analyses reported in Item V performed by a contract laboratory or consulting firm?

☑ YES (*list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below*) ☐ NO (*go to Section IX*)

A. NAME	B. ADDRESS	C. TELEPHONE (*area code & no.*)	D. POLLUTANTS ANALYZED (*list*)
Coastal Environmental	6400 Enterprise Court Glouster, VA 23061	804-694-8285	Biological tests
Air, Water and Soil	2109-D Hamilton Street Richmond, VA 23230	804-358-8295	pH, TPH, TSS, TOC and priority pollutants

IX. CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. NAME & OFFICIAL TITLE (*type or print*)	B. PHONE NO. (*area code & no.*)
Michael T. Spence, Terminal Manager	(804) 226-2650
C. SIGNATURE	D. DATE SIGNED
	09/27/2007

PLEASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of this information on separate sheets (*use the same format*) instead of completing these pages.
SEE INSTRUCTIONS.

EPA I.D. NUMBER (*copy from Item 1 of Form 1*)
VA0055409

V. INTAKE AND EFFLUENT CHARACTERISTICS *(continued from page 3 of Form 2-C)*

OUTFALL NO.
001

PART A –You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

1. POLLUTANT	2. EFFLUENT							3. UNITS (*specify if blank*)		4. INTAKE (*optional*)		
	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
a. Biochemical Oxygen Demand (*BOD*)	<4.0	.0757					1	mg/l	kg/day			
b. Chemical Oxygen Demand (*COD*)	We believe	that	TOC is a	better	parameter for	analysis	than	COD				
c. Total Organic Carbon (*TOC*)	12.9	.2442					1	mg/l	kg/day			
d. Total Suspended Solids (*TSS*)	6.8	.1287					1	mg/l	kg/day			
e. Ammonia (*as N*)	With the	product	stored	at our	facility, we do	not	believe	that	Ammoni	a would	be	present
f. Flow	VALUE .005 MGD		VALUE		VALUE		EST			VALUE		
g. Temperature (*winter*)	VALUE Ambient		VALUE		VALUE			°C		VALUE		
h. Temperature (*summer*)	VALUE Ambient		VALUE		VALUE			°C		VALUE		
i. pH	MINIMUM 6.4	MAXIMUM 6.4	MINIMUM	MAXIMUM			1	STANDARD UNITS				

PART B – Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2a for any pollutant which is limited either directly, or indirectly but expressly, in an effluent limitations guideline, you must provide the results of at least one analysis for that pollutant. For other pollutants for which you mark column 2a, you must provide quantitative data or an explanation of their presence in your discharge. Complete one table for each outfall. See the instructions for additional details and requirements.

1. POLLUTANT AND CAS NO. (*if available*)	2. MARK "X"		3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. BELIEVED PRESENT	b. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
a. Bromide (24959-67-9)		X												
b. Chlorine, Total Residual		X												
c. Color		X												
d. Fecal Coliform		X												
e. Fluoride (16984-48-8)		X												
f. Nitrate-Nitrite (*as N*)		X												

ITEM V-B CONTINUED FROM FRONT

1. POLLUTANT AND CAS NO. (*if available*)	2. MARK "X"		3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. BELIEVED PRESENT	b. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
g. Nitrogen, Total Organic (*as N*)		X												
h. Oil and Grease	X		<10.0	<.1893					1	mg/l	kg/l			
i. Phosphorus (as P), Total (7723-14-0)		X												
j. Radioactivity														
(1) Alpha, Total		X												
(2) Beta, Total		X												
(3) Radium, Total		X												
(4) Radium 226, Total		X												
k. Sulfate (*as SO_4*) (14808-79-8)		X												
l. Sulfide (*as S*)		X												
m. Sulfite (*as SO_3*) (14265-45-3)		X												
n. Surfactants		X												
o. Aluminum, Total (7429-90-5)		X												
p. Barium, Total (7440-39-3)		X												
q. Boron, Total (7440-42-8)		X												
r. Cobalt, Total (7440-48-4)		X												
s. Iron, Total (7439-89-6)		X												
t. Magnesium, Total (7439-95-4)		X												
u. Molybdenum, Total (7439-98-7)		X												
v. Manganese, Total (7439-96-5)		X												
w. Tin, Total (7440-31-5)		X												
x. Titanium, Total (7440-32-6)		X												

CONTINUE ON PAGE V-3

EPA I.D. NUMBER (*copy from Item 1 of Form 1*)	OUTFALL NUMBER
VA0055409	001

CONTINUED FROM PAGE 3 OF FORM 2-C

PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a (*secondary industries, nonprocess wastewater outfalls, and nonrequired GC/MS fractions*), mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you believe is absent. If you mark column 2a for any pollutant, you must provide the results of at least one analysis for that pollutant. If you mark column 2b for any pollutant, you must provide the results of at least one analysis for that pollutant if you know or have reason to believe it will be discharged in concentrations of 10 ppb or greater. If you mark column 2b for acrolein, acrylonitrile, 2,4 dinitrophenol, or 2-methyl-4, 6 dinitrophenol, you must provide the results of at least one analysis for each of these pollutants which you know or have reason to believe that you discharge in concentrations of 100 ppb or greater. Otherwise, for pollutants for which you mark column 2b, you must either submit at least one analysis or briefly describe the reasons the pollutant is expected to be discharged. Note that there are 7 pages to this part; please review each carefully. Complete one table (*all 7 pages*) for each outfall. See instructions for additional details and requirements.

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
METALS, CYANIDE, AND TOTAL PHENOLS															
1M. Antimony, Total (7440-36-0)			X												
2M. Arsenic, Total (7440-38-2)			X												
3M. Beryllium, Total (7440-41-7)			X												
4M. Cadmium, Total (7440-43-9)			X												
5M. Chromium, Total (7440-47-3)			X												
6M. Copper, Total (7440-50-8)			X												
7M. Lead, Total (7439-92-1)			X												
8M. Mercury, Total (7439-97-6)			X												
9M. Nickel, Total (7440-02-0)			X												
10M. Selenium, Total (7782-49-2)			X												
11M. Silver, Total (7440-22-4)			X												
12M. Thallium, Total (7440-28-0)			X												
13M. Zinc, Total (7440-66-6)			X												
14M. Cyanide, Total (57-12-5)			X												
15M. Phenols, Total			X												
DIOXIN															
2,3,7,8-Tetra-chlorodibenzo-P-Dioxin (1764-01-6)			X	DESCRIBE RESULTS											

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – VOLATILE COMPOUNDS															
1V. Accrolein (107-02-8)			X												
2V. Acrylonitrile (107-13-1)			X												
3V. Benzene (71-43-2)		X		<10.0	.0019					1	ug/l	kg/l			
4V. Bis (*Chloromethyl*) Ether (542-88-1)			X												
5V. Bromoform (75-25-2)			X												
6V. Carbon Tetrachloride (56-23-5)			X												
7V. Chlorobenzene (108-90-7)			X												
8V. Chlorodibromomethane (124-48-1)			X												
9V. Chloroethane (75-00-3)			X												
10V. 2-Chloroethylvinyl Ether (110-75-8)			X												
11V. Chloroform (67-66-3)			X												
12V. Dichlorobromomethane (75-27-4)			X												
13V. Dichlorodifluoromethane (75-71-8)			X												
14V. 1,1-Dichloroethane (75-34-3)			X												
15V. 1,2-Dichloroethane (107-06-2)			X												
16V. 1,1-Dichloroethylene (75-35-4)			X												
17V. 1,2-Dichloropropane (78-87-5)			X												
18V. 1,3-Dichloropropylene (542-75-6)			X												
19V. Ethylbenzene (100-41-4)		X		<10.0	<.0019					1	ug/l	kg/l			
20V. Methyl Bromide (74-83-9)			X												
21V. Methyl Chloride (74-87-3)			X												

CONTINUE ON PAGE V-5

CONTINUED FROM PAGE V-4

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – VOLATILE COMPOUNDS (*continued*)															
22V. Methylene Chloride (75-09-2)			X												
23V. 1,1,2,2-Tetrachloroethane (79-34-5)			X												
24V. Tetrachloroethylene (127-18-4)			X												
25V. Toluene (108-88-3)		X		<10.0	<.0019					1	ug/l	kg/l			
26V. 1,2-Trans-Dichloroethylene (156-60-5)			X												
27V. 1,1,1-Trichloroethane (71-55-6)			X												
28V. 1,1,2-Trichloroethane (79-00-5)			X												
29V Trichloroethylene (79-01-6)			X												
30V. Trichlorofluoromethane (75-69-4)			X												
31V. Vinyl Chloride (75-01-4)			X												
GC/MS FRACTION – ACID COMPOUNDS															
1A. 2-Chlorophenol (95-57-8)			X												
2A. 2,4-Dichlorophenol (120-83-2)			X												
3A. 2,4-Dimethylphenol (105-67-9)			X												
4A. 4,6-Dinitro-O-Cresol (534-52-1)			X												
5A. 2,4-Dinitrophenol (51-28-5)			X												
6A. 2-Nitrophenol (88-75-5)			X												
7A. 4-Nitrophenol (100-02-7)			X												
8A. P-Chloro-M-Cresol (59-50-7)			X												
9A. Pentachlorophenol (87-86-5)			X												
10A. Phenol (108-95-2)			X												
11A. 2,4,6-Trichlorophenol (88-05-2)			X												

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS															
1B. Acenaphthene (83-32-9)			X												
2B. Acenaphtylene (208-96-8)			X												
3B. Anthracene (120-12-7)			X												
4B. Benzidine (92-87-5)			X												
5B. Benzo (*a*) Anthracene (56-55-3)			X												
6B. Benzo (*a*) Pyrene (50-32-8)			X												
7B. 3,4-Benzo-fluoranthene (205-99-2)			X												
8B. Benzo (*ghi*) Perylene (191-24-2)			X												
9B. Benzo (*k*) Fluoranthene (207-08-9)			X												
10B. Bis (*2-Chloro-ethoxy*) Methane (111-91-1)			X												
11B. Bis (*2-Chloro-ethyl*) Ether (111-44-4)			X												
12B. Bis (*2-Chloroisopropyl*) Ether (102-80-1)			X												
13B. Bis (*2-Ethyl-hexyl*) Phthalate (117-81-7)			X												
14B. 4-Bromophenyl Phenyl Ether (101-55-3)			X												
15B. Butyl Benzyl Phthalate (85-68-7)			X												
16B. 2-Chloro-naphthalene (91-58-7)			X												
17B. 4-Chloro-phenyl Phenyl Ether (7005-72-3)			X												
18B. Chrysene (218-01-9)			X												
19B. Dibenzo (*a,h*) Anthracene (53-70-3)			X												
20B. 1,2-Dichloro-benzene (95-50-1)			X												
21B. 1,3-Di-chloro-benzene (541-73-1)			X												

CONTINUED FROM PAGE V-6

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS (*continued*)															
22B. 1,4-Dichlorobenzene (106-46-7)			X												
23B. 3,3-Dichlorobenzidine (91-94-1)			X												
24B. Diethyl Phthalate (84-66-2)			X												
25B. Dimethyl Phthalate (131-11-3)			X												
26B. Di-N-Butyl Phthalate (84-74-2)			X												
27B. 2,4-Dinitrotoluene (121-14-2)			X												
28B. 2,6-Dinitrotoluene (606-20-2)			X												
29B. Di-N-Octyl Phthalate (117-84-0)			X												
30B. 1,2-Diphenylhydrazine (*as Azobenzene*) (122-66-7)			X												
31B. Fluoranthene (206-44-0)			X												
32B. Fluorene (86-73-7)			X												
33B. Hexachlorobenzene (118-74-1)			X												
34B. Hexachlorobutadiene (87-68-3)			X												
35B. Hexachlorocyclopentadiene (77-47-4)			X												
36B Hexachloroethane (67-72-1)			X												
37B. Indeno (*1,2,3-cd*) Pyrene (193-39-5)			X												
38B. Isophorone (78-59-1)			X												
39B. Naphthalene (91-20-3)			X												
40B. Nitrobenzene (98-95-3)			X												
41B. N-Nitrosodimethylamine (62-75-9)			X												
42B. N-Nitrosodi-N-Propylamine (621-64-7)			X												

CONTINUED FROM THE FRONT

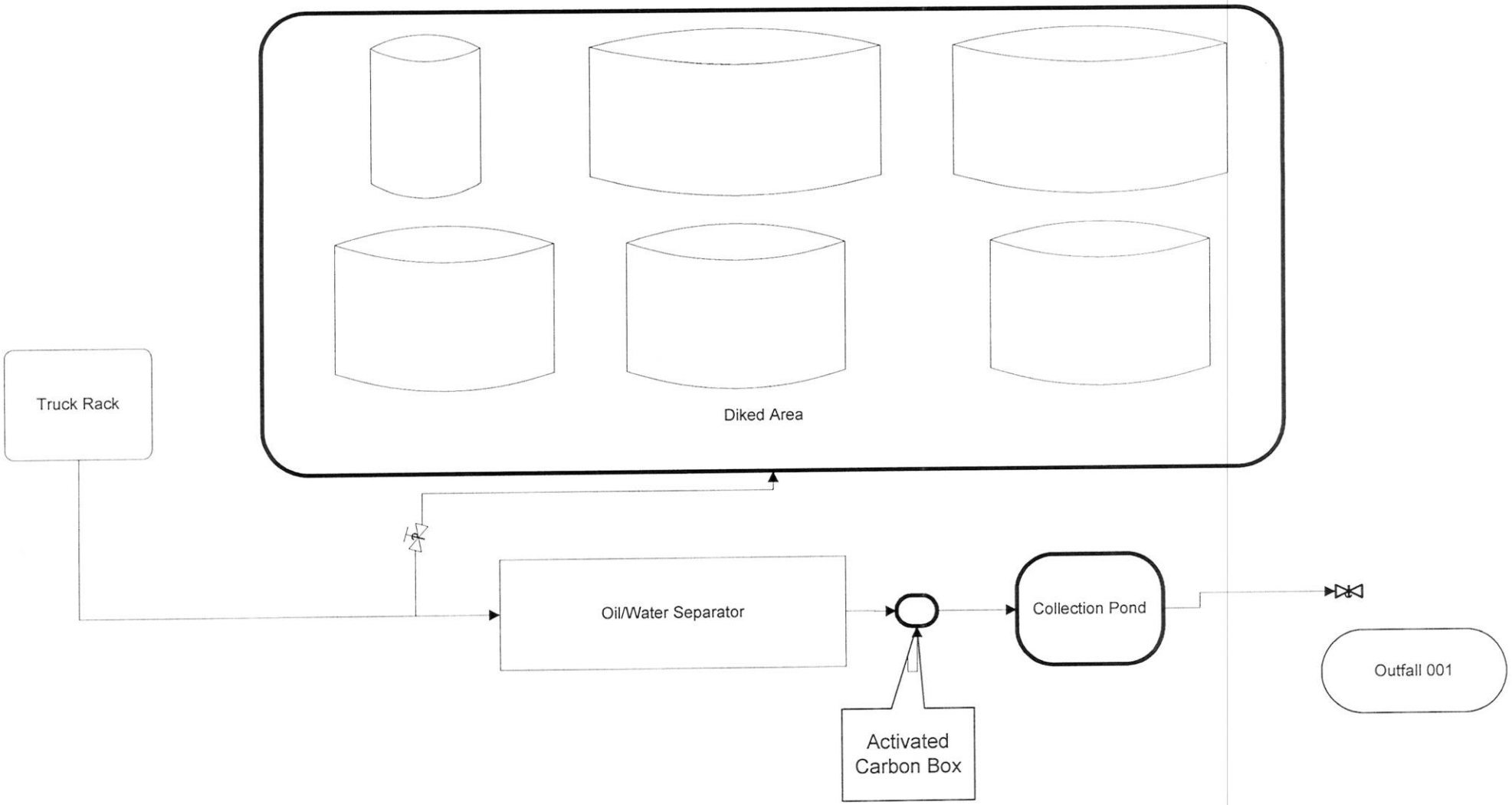
1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS (*continued*)															
43B. N-Nitro-sodiphenylamine (86-30-6)			X												
44B. Phenanthrene (85-01-8)			X												
45B. Pyrene (129-00-0)			X												
46B. 1,2,4-Tri-chlorobenzene (120-82-1)			X												
GC/MS FRACTION – PESTICIDES															
1P. Aldrin (309-00-2)			X												
2P. α-BHC (319-84-6)			X												
3P. β-BHC (319-85-7)			X												
4P. γ-BHC (58-89-9)			X												
5P. δ-BHC (319-86-8)			X												
6P. Chlordane (57-74-9)			X												
7P. 4,4'-DDT (50-29-3)			X												
8P. 4,4'-DDE (72-55-9)			X												
9P. 4,4'-DDD (72-54-8)			X												
10P. Dieldrin (60-57-1)			X												
11P. α-Enosulfan (115-29-7)			X												
12P. β-Endosulfan (115-29-7)			X												
13P. Endosulfan Sulfate (1031-07-8)			X												
14P. Endrin (72-20-8)			X												
15P. Endrin Aldehyde (7421-93-4)			X												
16P. Heptachlor (76-44-8)			X												

CONTINUE ON PAGE V-9

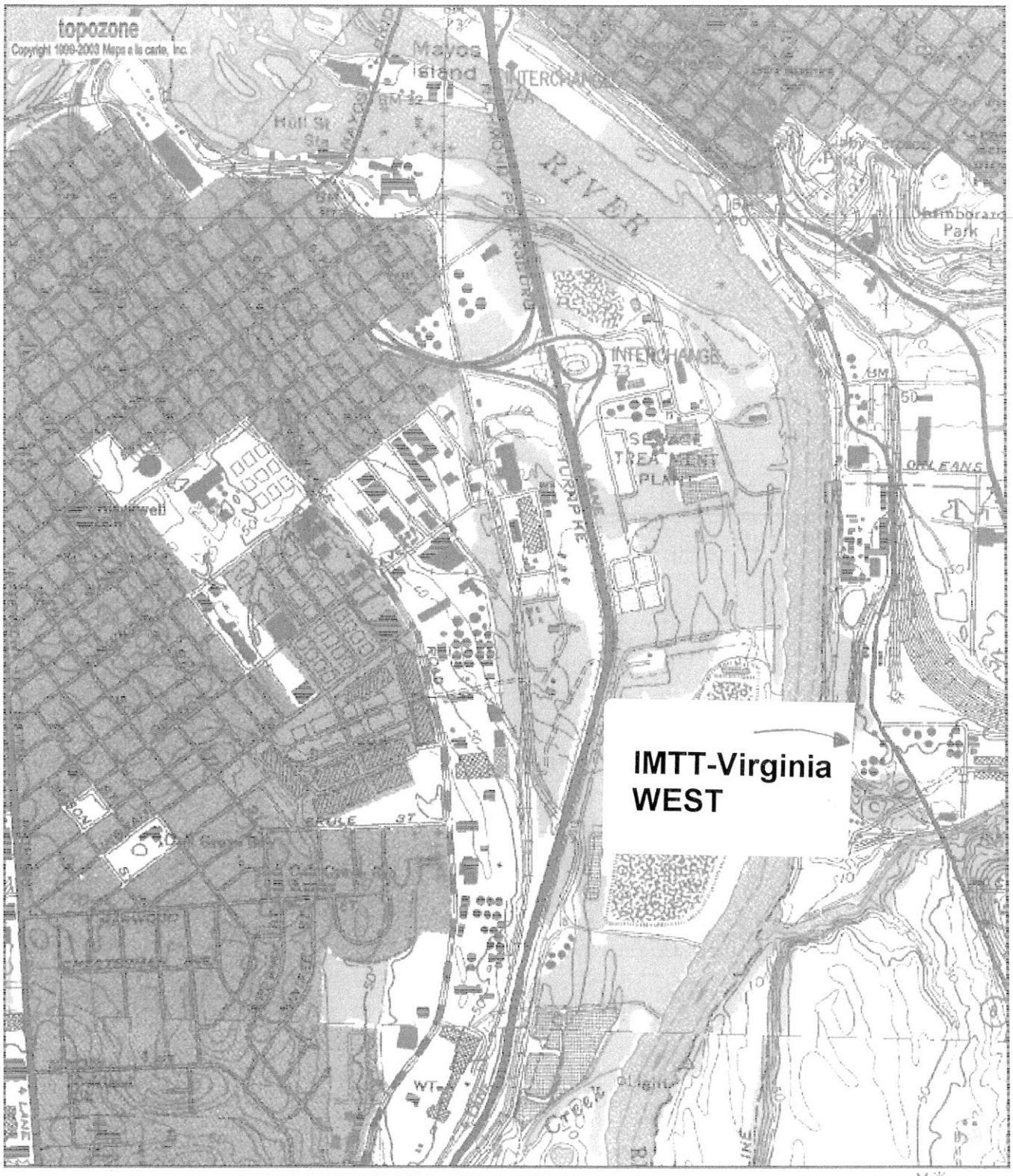
EPA I.D. NUMBER (*copy from Item 1 of Form 1*)	OUTFALL NUMBER
VA0055409	001

CONTINUED FROM PAGE V-8

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (*if available*)		c. LONG TERM AVRG. VALUE (*if available*)		d. NO. OF ANALYSES	a. CONCEN-TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – PESTICIDES (*continued*)															
17P. Heptachlor Epoxide (1024-57-3)			X												
18P. PCB-1242 (53469-21-9)			X												
19P. PCB-1254 (11097-69-1)			X												
20P. PCB-1221 (11104-28-2)			X												
21P. PCB-1232 (11141-16-5)			X												
22P. PCB-1248 (12672-29-6)			X												
23P. PCB-1260 (11096-82-5)			X												
24P. PCB-1016 (12674-11-2)			X												
25P. Toxaphene (8001-35-2)			X												



Line Drawing of Facility Showing Water Flow Through the IMTT-Virginia West Facility



0 0.3 0.6 0.9 1.2 1.5 km

0 0.2 0.4 0.6 0.8 1 mi

UTM 18 285344E 4154634N (NAD83/WGS84)

USGS Richmond (VA) Quadrangle

Projection is UTM Zone 18 NAD83 Datum

M=-10.072
G=-1.48

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Certificate of Analysis

Final Report

Laboratory Order ID 08020188

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: February 14, 2008
Date Issued: February 25, 2008

Submitted To: Mike Spence
Project Number: NA

Client Site I.D.: Richmond West
Purchase Order NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 08020188-001

Date/Time Sampled: 02/14/08 10:27

Parameter	Method	Sample Results	Rep Limi	Analysis Date/Time	Analyst
Chromium, Hexavalent	EPA218.4/SM3500 Cr D	< 0.01 mg/L	0.010	02/14/08 17:20	JCW
pH	SM4500-H B	6.7 SU	--	02/14/08 10:28	ETS
Cadmium	EPA200.9	0.0018 mg/L	0.0003	02/19/08 16:10	DMH
Copper	EPA200.9	0.006 mg/L	0.003	02/18/08 11:41	DMH
Lead	EPA200.9	0.016 mg/L	0.002	02/21/08 10:54	DMH
Nickel	EPA200.9	< 0.003 mg/L	0.003	02/21/08 15:36	CGT
Silver	EPA200.9	< 0.0002 mg/L	0.0002	02/21/08 15:07	DMH
Zinc	EPA200.7	0.102 mg/L	0.010	02/20/08 16:05	CGT
TPH-Volatiles (GRO)	SW8015B	< 0.5 mg/L	0.5	02/15/08 17:44	MKD
TPH-Semi-Volatiles (DRO)	SW8015B	5.0 mg/L	0.5	02/15/08 19:16	JHV
Chlorine, Residual	SM4500-Cl G	< 0.1 mg/L	0.1	02/14/08 10:35	ETS
Total Organic Carbon (TOC)	SM5310C	12.9 mg/L	1.0	02/18/08 14:57	JCW
Tributyltin	85-3295	See Attached	0.05		

Ted Soyars

Laboratory Manager

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Certificate of Analysis

Final Report

Laboratory Order ID 08020188

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: February 14, 2008
Date Issued: February 26, 2008

Submitted To: Mike Spence
Client Site I.D.: Richmond West

Project Number: NA
Purchase Order: NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 08020188-001
Date/Time Sampled: 02/14/08 10:27

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
Chromium, Hexavalent	EPA218.4/SM3500C r D	< 0.005 mg/L	0.005	02/14/08 17:20	JCW
pH	SM4500-H B	6.7 SU	--	02/14/08 10:28	ETS
Cadmium	EPA200.9	0.0018 mg/L	0.0003	02/19/08 16:10	DMH
Copper	EPA200.9	0.006 mg/L	0.003	02/18/08 11:41	DMH
Lead	EPA200.9	0.016 mg/L	0.002	02/21/08 10:54	DMH
Nickel	EPA200.9	< 0.003 mg/L	0.003	02/21/08 15:36	CGT
Silver	EPA200.9	< 0.00015 mg/L	0.00015	02/21/08 15:07	DMH
Zinc	EPA200.7	0.102 mg/L	0.010	02/20/08 16:05	CGT
TPH-Volatiles (GRO)	SW8015B	< 0.5 mg/L	0.5	02/15/08 17:44	MKD
TPH-Semi-Volatiles (DRO)	SW8015B	5.0 mg/L	0.5	02/15/08 19:16	JHV
Chlorine, Residual	SM4500-Cl G	< 0.1 mg/L	0.1	02/14/08 10:35	ETS
Total Organic Carbon (TOC)	SM5310C	12.9 mg/L	1.0	02/18/08 14:57	JCW
Tributyltin	85-3295	See Attached	0.05		

Ted Soyars
Laboratory Manager

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Certificate of Analysis

Final Report

Laboratory Order ID 07120246

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: December 18, 2007
Date Issued: January 07, 2008

Submitted To: Mike Spence
Project Number: NA

Client Site I.D.: IMTT Richmond West Attachment A
Purchase Order: NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 07120246-001
Date/Time Sampled: 12/18/07 11:50

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
Chromium, Dissolved Hexavalent	EPA218.4/SM3500Cr D	< 0.01 mg/L	0.010	12/19/07 11:10	JCW
Chromium, Dissolved Trivalent	Calc.	< 0.01 mg/L	0.010	12/19/07 11:10	JCW
Fecal Coliform	SM9221E	110 mpn/100mL	2	12/18/07 14:03	RPF
Antimony, Dissolved	EPA200.9	< 0.005 mg/L	0.005	01/07/08 11:32	DMH
Arsenic, Dissolved	EPA200.7	< 0.01 mg/L	0.010	12/19/07 12:17	CGT
Calcium	EPA200.7	8.09 mg/L	0.050	12/19/07 12:13	CGT
Chromium, Dissolved	EPA200.7	< 0.01 mg/L	0.010	12/19/07 12:17	CGT
Hardness (Calc)	SM2340B	30.2 mg/L	1.0	12/19/07 10:22	CGT
Lead, Dissolved	EPA200.7	0.019 mg/L	0.010	12/19/07 12:17	CGT
Magnesium	EPA200.7	2.43 mg/L	0.010	12/19/07 12:13	CGT
Mercury, Dissolved	EPA245.1	< 0.0002 mg/L	0.0002	12/21/07 10:53	DMH
Nickel, Dissolved	EPA200.7	< 0.01 mg/L	0.010	12/19/07 12:17	CGT
Selenium, Dissolved	EPA200.9	< 0.003 mg/L	0.003	12/26/07 19:52	DMH
Silver, Dissolved	EPA200.7	< 0.01 mg/L	0.010	12/19/07 12:17	CGT
m,p-Xylenes	SW8021B	< 4 ug/L	4.0	12/21/07 17:50	MKD
o-Xylene	SW8021B	< 2 ug/L	2.0	12/21/07 17:50	MKD
Xylenes, Total	SW8021B	< 6 ug/L	6.0	12/21/07 17:50	MKD
Acrolein	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Acrylonitrile	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Chloromethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Vinyl chloride	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Bromomethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Chloroethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Trichlorofluoromethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,1-Dichloroethylene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Methylene chloride	EPA624	< 20 ug/L	20.0	12/20/07 18:38	DMB
trans-1,2-Dichloroethylene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,1-Dichloroethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Chloroform	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,1,1-Trichloroethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Carbon tetrachloride	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB

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Certificate of Analysis

Final Report

Laboratory Order ID 07120246

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: December 18, 2007
Date Issued: January 07, 2008

Submitted To: Mike Spence
Project Number: NA

Client Site I.D.: IMTT Richmond West Attachment A
Purchase Order: NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 07120246-001
Date/Time Sampled: 12/18/07 11:50

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
Benzene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,2-Dichloroethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Trichloroethylene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,2-Dichloropropane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Bromodichloromethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
2-Chloroethyl vinyl ether	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
cis-1,3-Dichloropropene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Toluene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
trans-1,3-Dichloropropene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,1,2-Trichloroethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Tetrachloroethylene (PCE)	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Dibromochloromethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Chlorobenzene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Ethylbenzene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
m,p-Xylenes	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
o-Xylene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Xylenes, Total	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Bromoform	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,1,2,2-Tetrachloroethane	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,3-Dichlorobenzene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,4-Dichlorobenzene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
1,2-Dichlorobenzene	EPA624	< 10 ug/L	10.0	12/20/07 18:38	DMB
Kepone	SW8270C	< 20 ug/L	20.0	12/21/07 20:07	JHV
Mirex	SW8081A	< 0.1 ug/L	0.100	12/27/07 17:02	RMW
PCB as Aroclor 1016	EPA608	< 1 ug/L	1.0	12/27/07 17:02	RMW
PCB as Aroclor 1221	EPA608	< 1 ug/L	1.0	12/27/07 17:02	RMW
PCB as Aroclor 1232	EPA608	< 1 ug/L	1.0	12/27/07 17:02	RMW
PCB as Aroclor 1242	EPA608	< 1 ug/L	1.0	12/27/07 17:02	RMW
PCB as Aroclor 1248	EPA608	< 1 ug/L	1.0	12/27/07 17:02	RMW
PCB as Aroclor 1254	EPA608	< 1 ug/L	1.0	12/27/07 17:02	RMW
PCB as Aroclor 1260	EPA608	< 1 ug/L	1.0	12/27/07 17:02	RMW

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Certificate of Analysis

Final Report

Laboratory Order ID 07120246

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: December 18, 2007
Date Issued: January 07, 2008

Submitted To: Mike Spence
Project Number: NA

Client Site I.D.: IMTT Richmond West Attachment A
Purchase Order: NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 07120246-001
Date/Time Sampled: 12/18/07 11:50

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
4,4-DDD	EPA608	< 0.1 ug/L	0.100	12/27/07 17:02	RMW
4,4-DDE	EPA608	< 0.04 ug/L	0.040	12/27/07 17:02	RMW
4,4-DDT	EPA608	< 0.01 ug/L	0.010	12/27/07 17:02	RMW
Aldrin	EPA608	< 0.02 ug/L	0.020	12/27/07 17:02	RMW
alpha-BHC	EPA608	< 0.02 ug/L	0.020	12/27/07 17:02	RMW
beta-BHC	EPA608	< 0.05 ug/L	0.050	12/27/07 17:02	RMW
Chlordane	EPA608	< 0.2 ug/L	0.20	12/27/07 17:02	RMW
delta-BHC	EPA608	< 0.05 ug/L	0.050	12/27/07 17:02	RMW
Dieldrin	EPA608	< 0.02 ug/L	0.020	12/27/07 17:02	RMW
Endosulfan I	EPA608	< 0.1 ug/L	0.100	12/27/07 17:02	RMW
Endosulfan II	EPA608	< 0.04 ug/L	0.040	12/27/07 17:02	RMW
Endosulfan sulfate	EPA608	< 0.01 ug/L	0.010	12/27/07 17:02	RMW
Endrin	EPA608	< 0.1 ug/L	0.100	12/27/07 17:02	RMW
Endrin aldehyde	EPA608	< 0.2 ug/L	0.200	12/27/07 17:02	RMW
gamma-BHC (Lindane)	EPA608	< 0.02 ug/L	0.020	12/27/07 17:02	RMW
Heptachlor	EPA608	< 0.05 ug/L	0.050	12/27/07 17:02	RMW
Heptachlor epoxide	EPA608	< 0.2 ug/L	0.200	12/27/07 17:02	RMW
Methoxychlor	EPA608	< 2 ug/L	2.00	12/27/07 17:02	RMW
Toxaphene	EPA608	< 3 ug/L	3.00	12/27/07 17:02	RMW
4-Chloro-3-methylphenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2-Chlorophenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2,4-Dichlorophenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2,4-Dimethylphenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
4,6-Dinitro-2-methylphenol	EPA625	< 50 ug/L	50.0	12/21/07 20:07	JHV
2,4-Dinitrophenol	EPA625	< 50 ug/L	50.0	12/21/07 20:07	JHV
2-Nitrophenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
4-Nitrophenol	EPA625	< 50 ug/L	50.0	12/21/07 20:07	JHV
Pentachlorophenol	EPA625	< 20 ug/L	20.0	12/21/07 20:07	JHV
Phenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2,4,6-Trichlorophenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Acenaphthene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Acenaphthylene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV

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Certificate of Analysis

Final Report

Laboratory Order ID 07120246

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: December 18, 2007
Date Issued: January 07, 2008

Submitted To: Mike Spence
Project Number: NA

Client Site I.D.: IMTT Richmond West Attachment A
Purchase Order: NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 07120246-001

Date/Time Sampled: 12/18/07 11:50

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
Anthracene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Benzo (a) anthracene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Benzo (b) fluoranthene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Benzo (k) fluoranthene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Benzo (g,h,i) perylene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Benzo (a) pyrene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
4-Bromophenyl phenyl ether	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Butyl benzyl phthalate	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
bis (2-Chloroethoxy) methane	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
bis (2-Chloroethyl) ether	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
bis (2-Chloroisopropyl) ether	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
4-Chlorophenyl phenyl ether	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Chrysene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Dibenz (a,h) anthracene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Di-n-butyl phthalate	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
1,2-Dichlorobenzene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
1,3-Dichlorobenzene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
1,4-Dichlorobenzene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Diethyl phthalate	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Dimethyl phthalate	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2,4-Dinitrotoluene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2,6-Dinitrotoluene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Di-n-octyl phthalate	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
bis (2-Ethylhexyl) phthalate	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Fluoranthene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Fluorene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Hexachlorobenzene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Hexachlorobutadiene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Hexachlorocyclopentadiene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Hexachloroethane	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Indeno (1,2,3-cd) pyrene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Isophorone	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV

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Certificate of Analysis

Final Report

Laboratory Order ID 07120246

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: December 18, 2007
Date Issued: January 07, 2008

Submitted To: Mike Spence
Project Number: NA

Client Site I.D.: IMTT Richmond West Attachment A
Purchase Order: NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 07120246-001
Date/Time Sampled: 12/18/07 11:50

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
Naphthalene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Nitrobenzene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
N-Nitrosodimethylamine	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
N-Nitrosodiphenylamine	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
N-Nitrosodi-N-propylamine	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Phenanthrene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Pyrene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
1,2,4-Trichlorobenzene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Benzidine	EPA625	< 50 ug/L	50.0	12/21/07 20:07	JHV
3,3-Dichlorobenzidine	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2,3,4,6-Tetrachlorophenol	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
2-Chloronaphthalene	EPA625	< 10 ug/L	10.0	12/21/07 20:07	JHV
Ammonia	EPA350.1	0.16 mg/L	0.10	12/19/07 13:12	RPF
Chloride	EPA300.0	3.3 mg/L	1.0	12/19/07 4:30	RMW
Cyanide	Kelada-01	< 0.01 mg/L	0.01	12/20/07 10:00	LG
pH	SM4500-H B	6.8 SU	–	12/18/07 14:17	RPF
The pH measurement was performed outside of the 15 minute holding time.					
Sulfide	SM4500-S2 E	< 1 mg/L	1.0	12/21/07 11:08	VLG
Dichlorvos	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Mevinphos	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Ethoprop	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Phorate	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Naled	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Diazinon	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Disulfoton	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Demeton-s	EPA622	< 0.5 ug/L	0.500	12/27/07 17:30	Sub-TA-FL
Demeton-o	EPA622	< 0.5 ug/L	0.500	12/27/07 17:30	Sub-TA-FL
Ronnel	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Chlorpyrifos	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Fenthion	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Trichloronat	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Fensulfothion	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL

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Certificate of Analysis

Final Report

Laboratory Order ID 07120246

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: December 18, 2007
Date Issued: January 07, 2008

Submitted To: Mike Spence
Project Number: NA

Client Site I.D.: IMTT Richmond West Attachment A
Purchase Order: NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 07120246-001
Date/Time Sampled: 12/18/07 11:50

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
Methyl parathion	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Tokuthion	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Merphos	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Stirophos	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Bolstar	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Azinophos, Methyl (Guthion)	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Coumaphos	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Sulfotepp	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Tepp	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Dimethoate	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Malathion	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
Ethyl parathion	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL
EPN	EPA622	< 5 ug/L	5.00	12/27/07 17:30	Sub-TA-FL

Ted Soyars
Laboratory Manager

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Certificate of Analysis

Final Report

Laboratory Order ID 07120253

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: December 18, 2007
Date Issued: December 27, 2007

Submitted To: Mike Spence
Project Number: NA

Client Site I.D.: Richmond Terminal Monthly
Purchase Order: NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 07120253-001
Date/Time Sampled: 12/18/07 13:25

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
TPH-Volatiles (GRO)	SW8015B	< 0.5 mg/L	0.5	12/21/07 18:19	MKD
TPH-Semi-Volatiles (DRO)	SW8015B	13.1 mg/L	0.5	12/20/07 15:11	JHV
Ammonia	EPA350.1	0.13 mg/L	0.10	12/19/07 13:12	RPF
BOD	SM5210B	10.7 mg/L	2.0	12/26/07 13:50	RPF & LG
COD	EPA410.4	82.1 mg/L	10.0	12/26/07 10:00	VLG
Oil and Grease	EPA1664A	< 10 mg/L	10.0	12/20/07 9:42	RPF
pH	SM4500-H B	7.0 SU	--	12/19/07 17:08	RPF
The pH measurement was performed outside of the 15 minute holding time.					
TSS	SM2540D	7.9 mg/L	1.0	12/21/07 10:25	LG
Total Organic Carbon (TOC)	SM5310C	23.7 mg/L	1.0	12/19/07 14:52	JCW

Sample I.D.: Outfall 002 E
Laboratory Sample I.D.: 07120253-002
Date/Time Sampled: 12/18/07 14:05

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
TPH-Volatiles (GRO)	SW8015B	< 0.5 mg/L	0.5	12/21/07 18:45	MKD
TPH-Semi-Volatiles (DRO)	SW8015B	< 0.5 mg/L	0.5	12/20/07 15:37	JHV
Ammonia	EPA350.1	< 0.1 mg/L	0.10	12/19/07 13:12	RPF
BOD	SM5210B	3.2 mg/L	2.0	12/26/07 13:50	RPF & LG
COD	EPA410.4	16.9 mg/L	10.0	12/26/07 10:00	VLG
Oil and Grease	EPA1664A	< 10 mg/L	10.0	12/20/07 9:42	RPF
pH	SM4500-H B	8.8 SU	--	12/18/07 17:08	RPF
The pH measurement was performed outside of the 15 minute holding time.					
TSS	SM2540D	74.7 mg/L	1.0	12/21/07 10:25	LG
Total Organic Carbon (TOC)	SM5310C	4.5 mg/L	1.0	12/19/07 14:52	JCW

UNIVERSAL LABORATORIES

20 Research Drive Hampton, Va 23666
1-800-695-2162
(757) 865-0880
Fax: (757) 865-8014
E-mail: info@universallaboratories.net

Date: Monday, February 25, 2008

Pages: Page 1 of 2

To: Jessica Comstock
Air Water & Soil Laboratories

Fax#: (804) 358-8297

From: Mike Jennings

Subject: Results for Project N/A
designated as UL Order Id 0802213 and received on
Monday, February 18, 2008

Virginia Drinking Water Lab# 00030
VDEQ Lab #000003

North Carolina Drinking Water Lab # 51706
North Carolina Wastewater/Groundwater Lab # 543

EPA LAB CODE VA00912 0802213-001

TELEPHONE: (757) 865-0880
TOLL-FREE: (800) 695-2182
FAX: (757) 865-8014

UNIVERSAL LABORATORIES

20 Research Drive Hampton, Va 23666

REPORT OF ANALYSIS

Order ID: 0802213

(REPORT DATE)
25-Feb-08

TO: Air Water & Soil Laboratories
2109 A North Hamilton Street
Richmond VA 23230
ATTN: Jessica Comstock

Project ID: N/A
Project # N/A
Site: 08020188-001
Matrix: Wastewater

UL Sample Number: 0802213-001
Sample ID: 08020188-001
Grab Date/Time: 2/14/2008 10:27
Composite Start: N/A
Composite Stop: N/A
Collected By: Client

Comments for Order:

Parameter	Method	Test Result		Units	UL Report Limit	Analysis Date/Time	Analyst
TBT Tributyltin	GC/FPD	<		ng/l	30	2/22/2008 13:01:00	JM

Comments for Sample ID 0802213-001
No comments

Respectfully Submitted,

Virginia Drinking Water Lab# 00030
VDEQ Lab #000003

North Carolina Drinking Water Lab # 51706
North Carolina Wastewater/Groundwater Lab # 543

EPA LAB CODE VA00912 0802213-001

AIR WATER & SOIL LABORATORIES, INC.
RICHMOND, VIRGINIA 23230
(804) 358-8295 PHONE
(804)358-8297 FAX

CHAIN OF CUSTODY

PAGE ____ OF ____

CLIENT NAME: IMTT Richmond	PROJECT NAME: Richmond West
CLIENT CONTACT: Mike Spence	SITE NAME:
CLIENT ADDRESS:	PROJECT NUMBER:
CLIENT PHONE NUMBER:	P.O. NUMBER:
CLIENT FAX NUMBER: / EMAIL:	REGULATORY AUTHORITY:
Is sample for compliance reporting? (YES) NO / Is sample from a chlorinated supply? YES (NO)	PWS I.D. #:
SAMPLER NAME (PRINT): GEORGE HARRIS / SAMPLER SIGNATURE: George Harris	Turn Around Time: Day(s)

Have ammonia and TKN samples been verified to be dechlorinated at the time of sampling?: YES NO

CLIENT SAMPLE I.D.	Composite Start Date	Composite Start Time	Grab Date or Composite Stop Date	Grab Time or Composite Stop Time	Number of Containers	Grab	Composite	Field Filtered (Dissolved Metals)	MATRIX: Ground Water / Surface Water	Waste Water / Storm Water	Drinking Water	Soil	Solids	Other ____	ANALYSIS: TPH DRO/GRO (HCl)	TOC (H_2SO_4)	Cd-GFAA Zn-ICP Cu-GFAA (HNO_3)	Pb-GFAA Ni-GFAA Ag-GFAA (HNO_3)	Tr.butyl/tin (HCl) Hex chromium	Res Cl_2 (mg/L)	pH-Field (SU)	COMMENTS: Quote I.D.: pH 7 buffer = 7.01 pH 4 buffer = 4.01 pH 10 buffer = 10.01 Cal 2-14-08 10:15 Res Cl_2 Std 0.2 mg/L 2-14-08 10:35 PLEASE NOTE PRESERVATIVE(S) or PUMP RATE (L/min)
1) Outfall 001 (W)			2-14-08	10:27	12	X				X					✓	✓	✓	✓	✓	<0.01	6.68/7.8°C @ 10:28
2)																						
3)																						
4)																						
5)																						
6)																						
7)																						
8)																						
9)																						
10)																						

RELINQUISHED: George Harris	DATE / TIME 2/14/08	RECEIVED: [illegible]	DATE / TIME 2-14-08 / 10:50	QC Data Package: Level I ☐ Level II ☐ Level III ☐ Level IV ☐	LAB USE ONLY — COOLER TEMP 4.2 °C
RELINQUISHED: [illegible]	DATE / TIME	RECEIVED: A McKenney	DATE / TIME 2-14-08 11:50		
RELINQUISHED:	DATE / TIME	RECEIVED:	DATE / TIME		

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Sample Conditions Che

08020188

IMTT
Richmond West

08020188
DUE: 5 Days
Recd: 02/14/08

Opened by: (print) A. McGinley
(sign) A. McGinley

Lab ID No.:

Date Cooler Opened: 2-14-08

		YES	NO	N/A
1.	How were samples received?			
	Fed Ex ☐			
	UPS ☐			
	Courier ☑			
	Walk In ☐			
2.	Were custody seals used?	☐	☐	☑
3.	If yes, are custody seals unbroken and intact at the date and time of arrival?	☐	☐	☑
4.	Are the custody papers filled out completely and correctly?	☑	☐	☐
5.	Do all bottle labels agree with custody papers?	☑	☐	☐
6.	Are the samples received on ice?	☑	☐	☐
7.	Is the temperature blank or representative sample within acceptable limits? (4 degrees Celsius +/-2)	☑	☐	☐
8.	Are all samples within holding time for requested tests?	☑	☐	☐
9	Is a sufficient amount of sample provided to perform the tests indicated?	☑	☐	☐
10	Are all samples in proper containers for the analyses requested?	☑	☐	☐
11	Are all samples appropriately preserved for the analyses requested?	☑	☐	☐
12	Are all volatile organic containers free of headspace?	☑	☐	☐

COMMENTS

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Certificate of Analysis

Final Report

Laboratory Order ID 08020188

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: February 14, 2008
Date Issued: February 26, 2008

Submitted To: Mike Spence
Project Number: NA

Client Site I.D.: Richmond West
Purchase Order: NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 08020188-001

Date/Time Sampled: 02/14/08 10:27

Parameter	Method	Sample Results	Rep Limit	Analysis Date/Time	Analyst
Chromium, Hexavalent	EPA218.4/SM3500Cr D	< 0.005 mg/L	0.005	02/14/08 17:20	JCW
pH	SM4500-H B	6.7 SU	--	02/14/08 10:28	ETS
Cadmium	EPA200.9	0.0018 mg/L	0.0003	02/19/08 16:10	DMH
Copper	EPA200.9	0.006 mg/L	0.003	02/18/08 11:41	DMH
Lead	EPA200.9	0.016 mg/L	0.002	02/21/08 10:54	DMH
Nickel	EPA200.9	< 0.003 mg/L	0.003	02/21/08 15:36	CGT
Silver	EPA200.9	< 0.00015 mg/L	0.00015	02/21/08 15:07	DMH
Zinc	EPA200.7	0.102 mg/L	0.010	02/20/08 16:05	CGT
TPH-Volatiles (GRO)	SW8015B	< 0.5 mg/L	0.5	02/15/08 17:44	MKD
TPH-Semi-Volatiles (DRO)	SW8015B	5.0 mg/L	0.5	02/15/08 19:16	JHV
Chlorine, Residual	SM4500-Cl G	< 0.1 mg/L	0.1	02/14/08 10:35	ETS
Total Organic Carbon (TOC)	SM5310C	12.9 mg/L	1.0	02/18/08 14:57	JCW
Tributyltin	85-3295	See Attached	0.05		

Ted Soyars
Laboratory Manager

AIR WATER & SOIL LABORATORIES, INC.®
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Certificate of Analysis

Final Report

Laboratory Order ID 08020188

Client Name: IMTT
5501 Old Osborne Turnpike
Richmond, VA 23231

Date Received: February 14, 2008
Date Issued: February 25, 2008

Submitted To: Mike Spence
Project Number: NA

Client Site I.D.: Richmond West
Purchase Order NA

Sample I.D.: Outfall 001 W
Laboratory Sample I.D.: 08020188-001

Date/Time Sampled: 02/14/08 10:27

Parameter	Method	Sample Results	Rep Limi	Analysis Date/Time	Analyst
Chromium, Hexavalent	EPA218.4/SM3500 Cr D	< 0.01 mg/L	0.010	02/14/08 17:20	JCW
pH	SM4500-H B	6.7 SU	--	02/14/08 10:28	ETS
Cadmium	EPA200.9	0.0018 mg/L	0.0003	02/19/08 16:10	DMH
Copper	EPA200.9	0.006 mg/L	0.003	02/18/08 11:41	DMH
Lead	EPA200.9	0.016 mg/L	0.002	02/21/08 10:54	DMH
Nickel	EPA200.9	< 0.003 mg/L	0.003	02/21/08 15:36	CGT
Silver	EPA200.9	< 0.0002 mg/L	0.0002	02/21/08 15:07	DMH
Zinc	EPA200.7	0.102 mg/L	0.010	02/20/08 16:05	CGT
TPH-Volatiles (GRO)	SW8015B	< 0.5 mg/L	0.5	02/15/08 17:44	MKD
TPH-Semi-Volatiles (DRO)	SW8015B	5.0 mg/L	0.5	02/15/08 19:16	JHV
Chlorine, Residual	SM4500-Cl G	< 0.1 mg/L	0.1	02/14/08 10:35	ETS
Total Organic Carbon (TOC)	SM5310C	12.9 mg/L	1.0	02/18/08 14:57	JCW
Tributyltin	85-3295	See Attached	0.05		

Ted Soyars

Laboratory Manager